DOCUMENT RESUME

ED 256 195 HE 018 229

TITLE	Public Policy, Accreditation, and State Approval in California. State Reliance on Non-Governmental Accrediting Agencies and on State Recognition of Postsecondary Institutions to Serve the Public Interest. Commission Report 84-28.
INSTITUTION	California State Postsecondary Education Commission, Sacramento.
PUB DATE	Jul 84
NOTE	111p.
PUB TYPE	Reports - Descriptive (141)
EDRS PRICE	MF01/PC05 Plus Postage.
DESCRIPTORS	*Academic Standards; *Accreditation (Institutions); *Accrediting Agencies; Certification; Educational Policy; Educational Quality; Eligibility; *Government Role; *Postsecondary Education; Private Colleges; Professional Education; *Public Policy; State Colleges; Student Financial Aid; Teacher Education; Two Year Colleges
IDENTIFIERS	*California; Licensing Examinations; Out of State Institutions

ABSTRACT

Recommendations concerning postsecondary accreditation in California are presented, with attention to public reliance on nongovernmental accreditation. After a review of the history of accreditation and its role in institutional oversight, attention is directed to national accreditation of colleges, regional accreditation by the Western Association of Schools and Colleges (WASC), specialized accreditation, and law school accreditation. Fifteen recommendations are offered concerning the following issues: assuring and increasing educational quality, monitoring private institutions to assure their compliance with minimum standards, monitoring institutional refund policies to assure consumer protection, identifying institutions eligible to participate in state-funded student assistance programs, identifying institutions and programs for licensing professional practitioners, identifying quality teacher education programs, assuring oversight of out-of-state operations, encouraging agency operation in the public interest, and relating specialized accreditation to institutions and institutional policies. Information on WASC's accreditation standards for senior- and junior-level institutions is appended, as are lists of accredited schools. (SW)

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PUBLIC POLICY, ACCREDITATION, & STATE APPROVAL IN CALIFORNIA

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The California Postsecondary Education Commission was created by the Legislature and the Governor in 1974 as the successor to the California Coordinating Council for Higher Education in order to coordinate and plan for education in California beyond high school. As a state agency, the Commission is responsible for assuring that the State's resources for postsecondary education are utilized effectively and efficiently; for promoting diversity, innovation, and responsiveness to the needs of students and society; and for advising the Legislature and the Governor on statewide educational policy and funding.

The Commission consists of 15 members. Nine represent the general public, with three each appointed by the Speaker of the Assembly, the Senate Rules Committee, and the Governor. The other six represent the major educational systems of the State.

The Commission holds regular public meetings throughout the year at which it takes action on staff studies and adopts positions on legislative proposals affecting postsecondary education. Further information about the Commission, its meetings, its staff, and its other publications may be obtained from the Commission offices at 1020 Twelfth Street, Sacramento, California 95814; telephone (916) 445-7933.

PUBLIC POLICY, ACCREDITATION, AND STATE APPROVAL IN CALIFORNIA

State Reliance on Non-Governmental Accrediting Agencies and on State Recognition of Postsecondary Institutions to Serve the Public Interest

CALIFORNIA POSTSECONDARY EDUCATION COMMISSION
1020 Twelfth Street, Sacramento, California 95814

Commission Report 84-28

Adopted July 23, 1984

CONTENTS

Page

SUMMARY 1

INTRODUCTION 11

PART ONE: POSTSECONDARY ACCREDITATION IN CALIFORNIA 13

- Origins and Development of Educational Accreditation 13
- Role and Structure of Accreditation in Institutional Oversight 16
- Regional Institutional Accreditation in California 19
  - Structure of the Senior and Community College Commissions 20
  - Purposes and Procedures of WASC Accreditation 21
  - Standards for WASC Accreditation 22
  - Costs of WASC Accreditation 25
  - Cooperative WASC Community College Project 25
- National Institutional Accreditation in California 26
  - American Association of Bible Colleges 26
  - Association of Independent Colleges and Schools 27
  - National Association of Trade and Technical Schools 28
  - National Home Study Council 29
- Specialized Accreditation in California 30
  - Procedures of Specialized Accreditation 33
  - Issues Regarding Specialized Accreditation 33
- Accreditation of Law Schools in California 35
  - The American Bar Association 35
  - The Committee of Bar Examiners of the State Bar of California 36
- Non-Governmental Oversight of Accreditation 38
- California State Review of Degree-Granting Institutions 41

PART TWO: CALIFORNIA STATE GOVERNMENT AND ACCREDITATION 47

- Assuring and Increasing Educational Quality 48
- Monitoring Independent and Private Institutions to Assure Their Compliance With Minimum Standards 51
- Monitoring Institutional Refund Policies to Assure Consumer Protection 52
- Identifying Institutions Eligible to Participate in State-Funded Student Assistance Programs 54
- Identifying Institutions and Programs for Licensing Professional Practitioners 55
- Identifying Quality Teacher Education Programs 59
- Assuring Oversight of Out-of-State Operations 60
- Encouraging Agency Operation in the Public Interest 63
  - Committee of Bar Examiners 66
  - Accrediting Commission for Senior Colleges and Universities of the Western Association of Schools and Colleges 67
- Relating Specialized Accreditation to Institutions and Institutional Policies 68

APPENDIX A Standards for Accreditation, Accrediting Commission for Senior Colleges and Universities, Western Association of Schools and Colleges 77

APPENDIX B Standards for Accreditation, Accrediting Commission for Community and Junior Colleges, Western Association of Schools and Colleges 83

APPENDIX C Institutions of Higher Education Operating in California, Accredited by the Western Association of Schools and Colleges, February 1984 89

APPENDIX D Process and Standards for Approval, California State Department of Education 95

APPENDIX E Changes in the Constitution of the Western Association of Schools and Colleges, Approved by the Senior Commission, June 20-22, 1984 107

REFERENCES 109

TABLES AND FIGURE

TABLE 1 Historical Development of Accreditation 14

TABLE 2 Specialized Accrediting Associations Recognized by the United States Secretary of Education and Operating in California 31-32

TABLE 3 Provisions for Degree-Granting Authority in California by Private Postsecondary Education Institutions 42

TABLE 4 Total Written Complaint Allegations Filed with the State Oversight Agency Against Accredited and Non-Accredited Institutions in California, 1980-81 - 1982-83 49

TABLE 5 Occupations that Require Education at an Accredited Institution as a Requisite for Licensure 56

TABLE 6 Occupations that Utilize Accreditation as One of Various Alternatives to Meet the Educational Requirements for Licensure 57-58

TABLE 7 Summary of the Purposes and Standards of Accreditation 64-65

TABLE 8 Accreditation Budget, California State University, 1981-82 Through 1984-85 70

TABLE 9 Annual Fees for Accreditation, University of California, 1983-84 71

TABLE 10 Most Recent Costs and Frequency of Accreditation Visits, University of California 72

TABLE 11 Specialized Accreditation of California Community Colleges and Programs, 1982 74

FIGURE 1 Regional Accrediting Associations of the United States 18

SUMMARY

In Public Policy, Accreditation, and State Approval in California, the California Postsecondary Education Commission offers the following conclusions and 15 recommendations related to eight issues of public reliance on non-governmental accreditation in the oversight of California's colleges and universities.

Historically, non-governmental accrediting associations and State agencies responsible for postsecondary education in California have maintained a positive and constructive relationship. This relationship has been based on a mutual understanding that the licensure of institutions by the State and the accreditation of institutions by non-governmental associations serve two very separate but complementary purposes.

- Licensure is a governmental regulatory activity by which the State grants institutions the authority to operate and award degrees and diplomas, and by which it determines that institutions have met minimum acceptable standards of educational quality and consumer protection.

- Accreditation is the process of ongoing peer and professional review of institutional operations that institutions may utilize as a means of improving their effectiveness and quality.

The California Postsecondary Education Commission believes that the State should maintain a strong, rigorous process for the qualitative review of educational institutions as part of its constitutional responsibilities for the chartering and licensure of postsecondary institutions. This State process should be sufficiently thorough as to assure the public in general, as well as other State agencies, that State recognition does identify institutions with educational programs that meet minimum quality standards. These responsibilities for quality review should not be delegated by the State to non-governmental accrediting associations. Accreditation provides an additional set of standards and a peer review process that institutions can voluntarily choose in developing levels of academic quality that are above and beyond the State's basic responsibilities for the licensure of postsecondary institutions. The maintenance of a strong State review process neither lessens the critical importance of accreditation nor moves the State into the role of an accrediting agency. Moreover, it does not imply that accreditation and State approval are equivalent.

ASSURING AND INCREASING EDUCATIONAL QUALITY

California relies on accreditation as an indicator of excellence in education. Accrediting standards are periodically reviewed and revised through a lengthy process of discussion among educators in order to identify the issues and practices that they feel underlie educational quality and institutional integrity. The accreditation process of the Western Association of Schools and Colleges alone, for example, annually involves approximately 500 educators from various institutions within California and selected western states visiting other educational institutions and talking with representatives of those institutions about methods to improve their educational program.

When educational accrediting associations initially developed in America, they were clearly voluntary, private associations. This situation has substantially changed, however, as a result of both public and governmental reliance on the judgments of these agencies, with accreditation now having assumed many public responsibilities.

At the same time, State reliance on accreditation has led to some confusion between the roles of accreditation and State approval in the areas of consumer protection, institutional eligibility for participation in financial aid programs, and the licensure of professional practitioners. Independent and private postsecondary institutions are now placed in the paradoxical situation whereby they can comply with the highest available level of quality review by the State agency responsible for their oversight -- the Office of Private Postsecondary Education in the Department of Education -- but still not be eligible to participate in State-funded financial assistance programs, or enroll students who, upon graduation, are eligible to take State tests for licensure in various occupations.

The California Postsecondary Education Commission thus concludes that the State should continue to consider accreditation as a major method to monitor and promote educational quality. At the same time, the State should not rely exclusively on accreditation for this purpose.

The Commission therefore recommends:

> RECOMMENDATION 1. Because non-governmental accreditation serves important functions that should be protected and preserved, accreditation should remain a non-governmental activity, and the State should not initiate activities designed to replace or inhibit its role in promoting educational quality.

In addition, the State should maintain a strong quality review and approval process for all independent and private institutions, so that (1) the public in general as well as other State agencies can rely upon this process in identifying institutions with worthwhile educational programs, (2) institutions can have the option to join or not join non-governmental associations, and (3) accrediting associations can continue their important activities without the fear of intervention by various political and economic interests within the State.

In order to assure and increase educational quality in California postsecondary education, the Commission therefore recommends:

> RECOMMENDATION 2. California should continue to utilize the two separate processes of non-governmental accreditation and State approval for independent and private institutions as they perform different yet complementary functions. Efforts should be made to strengthen both processes wherever possible.

RECOMMENDATION 3. The State-approval process for degree-granting institutions should continue to be programmatic approval, but it should be revised to stipulate that an institution cannot advertise itself as having State approval status until all of its degree programs have been qualitatively reviewed and approved by the State's oversight agency.

RECOMMENDATION 4. To provide an opportunity for an institution with institution-wide programmatic approval to add a new program on a tentative basis, after operating with approval status for at least two years, it should be eligible to offer a maximum of one unapproved program for a period of no longer than three years. After that period, the program should be expected to achieve State approval or be eliminated.

MONITORING INDEPENDENT AND PRIVATE INSTITUTIONS TO ASSURE THEIR COMPLIANCE WITH MINIMUM STANDARDS

Independent and private degree and non-degree-granting institutions are eligible to operate in California as a result either of accreditation by an accrediting association recognized by the U.S. Secretary of Education or of approval or authorization by the Superintendent of Public Instruction or (for selected vocational schools) by the Department of Consumer Affairs. Institutions that operate in California on the basis of their accredited status are not subject to State oversight of their academic or vocational programs, and they are assumed to operate in compliance with the minimum consumer protection provisions required of non-accredited institutions.

This exemption from State oversight for accredited institutions creates an anomaly in public policy. The ability of the State to remove the license of an accredited institution which is not in compliance with State law is restricted by current law, as that authority has been delegated to the accrediting associations. Therefore, the Commission recommends:

RECOMMENDATION 5. The State should continue to rely on accrediting associations to exercise primary responsibility for the oversight of accredited independent and private institutions. Nonetheless, when available evidence suggests a reasonable probability of non-compliance by an accredited institution with State standards for approval, the State oversight agency should work with the accrediting association to correct the situation. The State agency should provide the accrediting association with all available evidence and request the association to provide a written response to the specific issues raised by the State. As a last resort, however, if the issues still remain unresolved after the accrediting association has had a reasonable period of time to work with the institution, the State should have the authority, after exhausting all administrative procedures necessary to insure the involved institution due process of law, to rescind the license of an accredited institution which is not in compliance with State standards.

MONITORING INSTITUTIONAL REFUND POLICIES TO ASSURE CONSUMER PROTECTION

State law provides a set of minimum standards for consumer protection for students and prospective students of private postsecondary institutions. Accredited institutions, however, are exempted from compliance with these provisions, apparently on the assumption that the consumer protection standards of the accrediting associations are higher than those maintained by the State for non-accredited institutions.

This assumption is generally accurate in all areas except for tuition refunds for a student withdrawing from an institution prior to completion of the course of study.

Therefore, in order to assure more equitable protection for students attending WASC-accredited institutions, the Commission recommends:

> RECOMMENDATION 6. The Senior and Community College Commissions of the Western Association of Schools and Colleges should review their current guidelines for tuition refund as well as the "Policy Guidelines for Refund of Student Charges" drafted by the National Association of College and University Business Officers, to determine if more specific guidelines on this issue should be implemented by the two commissions.

IDENTIFYING INSTITUTIONS ELIGIBLE TO PARTICIPATE IN STATE-FUNDED STUDENT ASSISTANCE PROGRAMS

California State policy of relying on accreditation for determining institutional eligibility for participation in State-funded student assistance programs has resulted in the anomaly that some institutions that meet the highest existing State standards for licensure to award degrees or diplomas cannot benefit from these programs because they have not applied for or have been denied recognition by non-governmental accrediting associations. Accordingly, the Commission recommends:

> RECOMMENDATION 7. The State criteria utilized to determine institutional eligibility for participation in State-funded undergraduate and graduate student assistance programs should be examined by the Student Aid Commission during the next year. This examination should consider the impact of modifying the criteria regarding institutional eligibility so that institutions qualitatively reviewed and approved by non-governmental accrediting associations or having institutionwide programmatic approval from the State oversight agency (as provided in Recommendation 3 above) are eligible for participation in the State programs if they meet all other State requirements. In preparing this review, the Student Aid Commission should include an analysis of the

total cost for any changes in institutional eligibility for participation in State financial aid programs, with this information submitted to the Legislature as appropriate.

IDENTIFYING INSTITUTIONS AND PROGRAMS FOR LICENSING PROFESSIONAL PRACTITIONERS

State policy in the licensure of professional practitioners has generally been to rely on specialized accrediting associations in the medical and health professions and either regional accreditation or State approval in other occupations. This State reliance on accrediting associations is generally both appropriate and reasonable.

The only exceptions are two occupations -- educational psychologist and geologist -- where the applicable licensing board requires graduation from an institution with regional accreditation. This requirement that an individual graduate from a regionally accredited institution before they can sit for the licensure exam is questionable. Since regional accreditation applies to the entire institution and not to specific programs, it does not provide explicit assurance that particular programs will have met the specific educational standards of that profession. Therefore the Commission recommends:

RECOMMENDATION 8. The expertise of specialized accrediting associations should continue to be used in the health professions as a means of screening out potential practitioners who have not met specific predetermined standards. In all other professions, graduation from an institution with regional accreditation or institution-wide programmatic approval by the State (as proposed in Recommendation 3) should continue to be required as a means of identifying individuals who have potentially met the requirements for licensure.

RECOMMENDATION 9: The Behavioral Science Examiners Board and the Geologist/Geophysicists Board should review their current practices that require graduation from a regionally accredited institution as a requirement for individuals to sit for licensure examinations in educational psychology and geology, respectively. Consideration should be given to the utilization of institution-wide programmatic approval by the State as an additional means to identify institutions with adequate educational programs.

IDENTIFYING QUALITY TEACHER EDUCATION PROGRAMS

California's Commission on Teacher Credentialing (formerly the Commission for Teacher Preparation and Licensing) has the dual responsibility of approving postsecondary institutions whose teacher education program meets its standards and then issuing credentials to persons who successfully complete programs at these institutions. State law does not prescribe that the

Commission approve only those programs operated by accredited institutions, yet the practice of the Commission is to require regional accreditation. In reality, therefore, institutions which have been qualitatively reviewed and approved only by the State Superintendent of Public Instruction or by national accrediting associations such as the American Association of Bible Colleges are not eligible for Commission approval.

By eliminating all institutions without regional accreditation from consideration as potential quality teacher education programs, current practice by the Commission on Teacher Credentialing perpetuates the contradiction that private postsecondary institutions with programs qualitatively reviewed and approved by one State agency (the Superintendent of Public Instruction) are not accepted by a different State agency (the Commission on Teacher Credentialing) as worthy of review for possible approval. In addition, the current Commission practice excludes institutions with national accreditation, despite the directive in the law that it shall consider "accredited baccalaureate degree granting institutions."

Arguments have been expressed against changing this current policy of the Commission on Teacher Credentialing. Considerable public disquiet exists concerning the quality of teacher preparation programs, and the inclusion of more teacher education programs for review by the Commission might allow weaker programs to be established throughout the State. It is also argued that preparation for teaching requires a total, coordinated program from the entire institution and not simply a narrow specialized major. Consequently, a total institutional review of all academic offerings is necessary, as provided through regional accreditation.

While the Postsecondary Education Commission sees merit in these arguments, it does not feel that regional accreditation should be the determinant of institutional eligibility for review by the Commission on Teacher Credentialing, as institutional accreditation by national associations and institution-wide programmatic approval by the State Department of Education also involve qualitative judgments by appropriate agencies.

ASSURING OVERSIGHT OF OUT-OF-STATE OPERATIONS

California policy regarding the oversight of operations by out-of-state institutions has remained consistent during the past two decades. Non-accredited institutions from outside California who sought to offer programs in the State have been required to meet the standards maintained by the State oversight agency for all non-accredited institutions. The responsibility for the oversight of out-of-state accredited institutions has been delegated to the appropriate home accrediting agency. However, during the past ten years, the regional accrediting commissions have adopted dissimilar approaches in responding to this issue, and consequently the public interests have not always been well-served in this area.

Considerable variation exists in the accreditation standards utilized by the six regional accrediting associations. The Western and Southern Associations, particularly the former, have the most detailed and specific set of standards. At the other end of the spectrum, the North Central Association does not have standards for accreditation but rather utilizes four "intentionally general" evaluative criteria to make judgments about institutions. The accreditation standards of the other three associations are presented in more general terms than those of the Western and Southern Assocations. This variation in the accrediting standards is one reason why the various cooperative agreements among the six regional accrediting associations has not produced an adequate level of oversight of accredited out-of-state institutions operating in California.

The California Legislature took action in 1981, by requiring all out-of-state institutions desiring to operate in California as regionally accredited institutions to have their California-based operations accredited by WASC rather than any of the other five regional accrediting associations. Passed by the Legislature in 1981, this requirement became effective on July 1, 1983, thereby allowing institutions two years to move into compliance.

The Commission recommends:

> RECOMMENDATION 10. Two important principles of the current WASC procedures for the review of California-based operations of out-of-state accredited institutions should be continued: (1) the utilization of WASC standards as the basis for accreditation, with (2) the final accreditation decision made by the Senior Commission of WASC. These institutions should also continue to have the option for either authorization or approval by the State oversight agency as an alternative for WASC accreditation.

ENCOURAGING AGENCY OPERATION IN THE PUBLIC INTEREST

As a result of the close relationship that has evolved between California State government and non-governmental accrediting associations, these associations have developed legal responsibilities to function in the public interest, not to act contrary to public policy, and to have fair procedures reasonably related to the purposes of accreditation.

After reviewing the structure and operation of accrediting agencies on these criteria, the Commission has concluded that improvements in two agencies will increase their effectiveness as representatives of the public interest.

Committee of Bar Examiners

The Committee of Bar Examiners plays a crucial role in the oversight of law schools in California, and because it is the only accrediting association in California created by statute and functioning clearly as a quasi-governmental agency, it is doubly imperative that its structure and operations be adequate. Its present organization and processes have two weaknesses:

- First, its members predominantly include representatives of the legal profession but no representatives of accredited law schools. It is thus the only accrediting body operating in California that does not include such representation, and it can therefore be accused of not being sufficiently sensitive to the educational role of accreditation and of representing to an unfair extent the interests of the profession.

  At the same time, however, difficulties would arise if representatives of accredited law schools were added to the Committee, as the Committee has many other functions beyond accreditation, including preparation of the California Bar Examination, supervision of the grading of these examinations, and action on all applications not decided by staff review. If representatives of accredited law schools had access to the examination process as members of the Committee, the integrity of the process would be suspect and conflict of interest might arise. While representatives of accredited law schools have an important and legitimate role to play in accrediting California law schools, potential conflict of interest situations should be avoided.

- Second, law schools that contend that the Committee has violated its own criteria or procedures in decisions about their denial or termination of accreditation have no recourse for the appeal of those decisions other than petitioning the California Supreme Court.

  In contrast, if any other accrediting association appears to violate its criteria or procedures in denying or terminating accreditation, an institution may appeal for review to COPA as well as to a Superior Court. Thus, law schools seeking or maintaining accreditation by the Committee of Bar Examiners are unique among California postsecondary institutions in not having a formal appeals process available to them.

Accordingly, the Commission recommends:

> RECOMMENDATION 11. The Committee of Bar Examiners should establish a separate committee with the responsibility for accrediting law schools, with the composition of this committee similar to that of the American Bar Association, including significant representation from accredited institutions. In addition, the Committee should develop and implement an appeals process for institutions similar to that maintained by the American Bar Association.

Accrediting Commission for Senior Colleges and Universities of the Western Association of Schools and Colleges

The Senior Commission of WASC is the only regional accrediting association in the United States which is not a membership organization. The institutions accredited by the Senior Commission have no direct voice in the selection of Commissioners. Moreover, the various constituents of accreditation -- the faculty, administrators, and public representatives -- have no formal participation in the selection process, as currently exists for the Community College Commission of WASC. By placing the authority for the selection of the Commissioners in the executive committee of the Western College Association (an association of accredited institutions from 13 western states), the Senior Commission has adopted a process which is unique among regional associations and which can justifiably be perceived as relatively closed and tightly controlled.

Thus the Postsecondary Education Commission recommends:

> RECOMMENDATION 12. The Senior Commission of WASC should continue to review its current process for the selection of commissioners and examine the processes used by other regional accrediting associations to determine if there is a method of more directly involving the member institutions and the various constituencies of accreditation in the selection of commissioners.

RELATING SPECIALIZED ACCREDITATION TO INSTITUTIONS AND INSTITUTIONAL POLICIES

In response both to problems associated with specialized accreditation as well as the increasing expenditures made by public institutions for membership in these specialized accrediting agencies, the Commission recommends:

> RECOMMENDATION 13. The systemwide offices of the three public segments should review their policies regarding the role of accreditation, with special attention to those specialized accrediting associations with standards and criteria for membership that are so specific and intrusive as to limit campus authority over curriculum and resource allocation. Campuses should be encouraged to take the lead within specialized accrediting associations to modify those standards and practices which are particularly intrusive into campus authority. If these efforts are unsuccessful, campuses should consider terminating their membership in these associations until such standards are modified, and students and the public should be informed about the reasons for this voluntary termination.

> RECOMMENDATION 14. The systemwide offices and the campuses of the three public segments should give special attention to the need for campuswide coordination of accrediting activities to facilitate cooperation, communication, and common planning for phased or joint evaluations by institutional and specialized accrediting associations in harmony with the institutions' own planning and evaluation cycles.

INTRODUCTION

Non-governmental accrediting agencies have played an important and unique role in the oversight of American schools, colleges, and universities during this century. During the past several decades, both state and federal governments have placed considerable reliance on them to monitor, promote, and identify quality in postsecondary education. Nevertheless, no state or federal laws regulate the proliferation of these associations or limit their activities; and in recent years, some questions have developed about public policy toward accreditation:

- How does the state rely on accreditation, and does such reliance serve public policy? Are there areas in which the State relies too little or too much on non-governmental accreditation?

- What has been the impact in California of State reliance on accreditation as a criterion for professional licensure? Has this reliance been adverse or beneficial to the public interest, and are there ways in which this relationship can be improved?

- What has been the impact of the increase in the number of specialized accrediting agencies on public institutions in California? Is there evidence that the current relationship between postsecondary institutions and specialized accrediting agencies is adverse to public interests, and are there ways in which this relationship can be improved?

- What are the direct and indirect costs of accreditation to public institutions, and does this expenditure seem to be a worthwhile investment of public funds?

- Are students and prospective students adequately protected by accreditation, or is consumer protection an illegitimate expectation of the public regarding accreditation?

- Do accrediting agencies adequately review the out-of-region and off-campus offerings of accredited institutions operating in California? Is greater cooperation between agencies and California's State oversight agency needed to improve the review of these programs?

In 1980, the Commission's Statutory Advisory Committee, consisting of representatives of California's major segments of education, requested the Commission to undertake a study of accreditation; and the Commission agreed to do so by addressing such questions as these. When the Commission began its study, it foresaw the possibility of recommending some change in State policy of reliance on accreditation. Since then, it has become clear that much of the State's reliance on accreditation deserves endorsement and continuation rather than change. Only in certain areas does the Commission believe that this reliance has gone too far, resulting in potential threats both to the independence of accrediting associations and to the public interest in general, and leading to unnecessary problems in the heretofore cooperative and constructive relationships between these associations and State agencies.

At the same time, it has become increasingly evident to the Commission that in addition to relying on accreditation to serve the public interest, California should maintain a strong rigorous process for State review of educational quality as part of its constitutional responsibilities for the chartering and licensure of postsecondary institutions. From the Commission's perspective, non-governmental accreditation and State approval of educational institutions are two separate, parallel, equally necessary, but not equivalent means of assuring the public about the quality of California colleges and universities; and in this report the Commission explains the relationship that it believes should exist between these two processes. Because the Commission believes changes are needed in the existing approval process, this report offers conclusions and recommendations not only about California's dependence on accreditation but also on its current policies and procedures of State approval.

Because the processes of accreditation and State approval are not widely understood, for those readers who want an overview of the subject, Part One describes the origins, purposes, and operation of accreditation on pages 13-41 and California's system of State authorization and approval on pages 41-47. Part Two then discusses State reliance on accreditation and offers 13 recommendations for public policy at the State level regarding improvements in accrediting and State approval.

In preparing this report, Commission staff has attended accreditation commission meetings, participated as observers on accrediting teams, reviewed accreditation self-study reports, conferred with officials of accrediting associations, State licensure and approval agencies, and institutions, and sought to reconcile the necessarily different perspectives of members of the Commission's Technical Advisory Committee on Accreditation. The names of the members of this Committee are listed in Appendix A, and the Commission acknowledges its appreciation of their assistance in the preparation of this report. It must be emphasized, however, that the Commission has not asked their approval or endorsement of the report. It must also be emphasized that the purpose of this report is not to evaluate the effectiveness of accrediting associations as such in accomplishing their important and valuable purposes. Rather, it seeks to assess how the State utilizes accreditation as a significant factor in assuring educational quality and thus serving State and public interests, as well as to identify those areas where this utilization and that of the State approval process can be improved.

PART ONE

POSTSECONDARY ACCREDITATION IN CALIFORNIA

Accreditation is a process of peer review through which the quality of an institution or program is assessed against pre-established and pre-published standards. Typically, in the United States, it refers to a non-governmental process whereby institutions voluntarily form associations for the purpose of self-regulation and self-improvement of their operations; and thus it differs both from government chartering, authorization, approval, or registration of institutions and also from government licensure or certification of individuals to perform professional services.

For example, in California, hospitals are accredited by the American Hospital Association; animal care facilities are accredited by the American Association for the Accreditation of Animal Care Facilities; schools, colleges, and universities are accredited by the Western Association of Schools and Colleges or one of several national organizations; and professional schools and programs are accredited by specialized agencies such as the American Dental Association, the Accreditation Board for Engineering and Technology, and the National League for Nursing.

ORIGINS AND DEVELOPMENT OF EDUCATIONAL ACCREDITATION

Table 1 on page 14 highlights major episodes in the development of accreditation in American education and its relation to government regulation.

Historically, school and college accreditation began in the 1890s, when secondary school principals and university leaders agreed on the need for improved cooperation to reduce the confusion about admission practices. For example, the Southern Association of Colleges and Schools was initiated in 1895 when, according to Agnew (1970, pp. 2-3):

> Throughout the South there were private academies and "colleges," most with inadequate faculties and ill-defined curricula. Many college students were at the "preparatory level." From this educational anarchy the Southern Association sought to bring about order by defining the difference between preparatory schools and colleges. The major thrust of the Association for the first fifteen years was to establish requirements for graduation from secondary schools and to establish admission and graduation requirements for colleges and universities.

TABLE 1 Historical Development of Accreditation

1787	State oversight of education began when the University of the State of New York (the New York Board of Regents) was established as a board for King's College (now Columbia University) and other colleges and schools in the state, with the responsibility to visit every college yearly, register each curriculum at each institution, and report yearly to the Legislature.
1847	The first voluntary non-profit educational association was initiated with the establishment of the American Medical Association, although the Association did not begin to accredit medical schools until 1906.
1900-1901	Specialized programmatic accrediting associations were initiated by the Association of American Law Schools (1900), the Society of American Foresters (1900), and the Committee on Education of the American Osteopathic Association (1901).
1895-1952	Accrediting standards were established and put into operation by the six regional associations: North Central in 1895, Southern in 1917, Middle States in 1919, Northwest in 1923, Western in 1948, and New England in 1952. (Prior to 1948, the University of California and the Northwest Association had accredited California schools and colleges.)
1949	University presidents created the National Commission on Accrediting to limit the proliferation of accrediting agencies.
1947	The American Association of Bible Colleges was established.
1952	Congress passed the Veterans Readjustment Assistance Act and, to protect use of veterans' educational grants, authorized the Commissioner of Education to "publish a list of nationally recognized accrediting agencies and associations which he determines to be reliable authority as to the quality of training offered by an educational institution" (Public Law 82-550, Section 1775).
1952-1965	Three national institutional accrediting agencies were established: The Association of Independent Colleges and Schools (1952), the Accrediting Commission of the National Home Study Council (1955), and the National Association of Trade and Technical Schools (1965).
1962	The Western Association of Schools and Colleges was formed to accredit colleges and universities, junior colleges, and secondary schools in California and Hawaii.
1972	The Higher Education Amendments Act expanded the eligibility for participation in federally funded financial assistance programs to vocational and technical institutions that were ineligible for regional accreditation but that were certified or approved by a federally recognized state agency, such as California's Office of Private Postsecondary Education.
1975	The Council on Postsecondary Accreditation (COPA) was established as the educational community's oversight agency on accreditation through the consolidation of the Federation of Regional Accrediting Commissions of Higher Education and the National Commission on Accrediting.

Beginning in the 1930s, the nation's six regional accrediting associations began to review institutions on the basis of their own stated objectives rather than on a single set of numerical criteria used for all institutions. The North Central Association took the lead in 1934 when it adopted the principle that "an institution will be judged in terms of the purposes it seeks to serve and on the basis of the total pattern it presents as an institution of higher education" (Selden, 1960, p. 41). Since 1975, there has been some movement back toward the use of a single set of standardized criteria for all institutions, but the regional associations continue to emphasize the importance of distinctive institutional goals in the evaluation process.

Several attempts have been made by presidents of colleges and universities to stop what has been perceived as a proliferation of specialized accrediting agencies or to limit the influence of those already in existence. In 1924, for example, both the American Council on Education and the National Association of State Universities took action in this area. In 1949, the National Commission on Accrediting was established by university presidents for a similar purpose. More recently, the Council on Postsecondary Accreditation (COPA) -- the successor to the National Commission -- has identified proliferation in accreditation as one of its major priorities for action. There seems to be general agreement among educators, however, that this problem has not yet been resolved.

An "umbrella" approach to accreditation has evolved during the past 50 years, whereby closely related professional organizations work together in evaluation. For example, in the 1930s, medically related associations in such fields as physical therapy and occupational therapy worked with the American Medical Association to develop accrediting standards and processes. In 1942, the American Medical Association and the Association of American Medical Colleges collaborated to form the Liaison Committee on Medical Education. Today, the Committee on Allied Health Education and Accreditation serves as an umbrella organization for 16 Joint Review Committees in the allied health field. Similar cooperative efforts have been initiated between the regional associations and specialized agencies to alleviate the problems of multiple visits and differing review schedules experienced by postsecondary institutions. Generally, however, this approach has not been as widespread and as comprehensive as many educators would prefer. The Council on Postsecondary Accreditation has developed and is currently in the process of implementing a policy statement on interagency cooperation that calls for cooperative visits and activity among accrediting associations when institutions express this interest.

Although the initial purposes of accrediting were to establish requirements for school programs and college admission and to recognize schools and colleges that met these requirements, during the past 30 years these purposes have expanded substantially. While there is some disagreement among educators and governmental officials on certain ones, they now include (Harcleroad, 1980, p. 8):

1. Certifying that an institution has met established standards;

2. Assisting prospective students in identifying acceptable institutions;

3. Assisting institutions in determining the acceptability of transfer credits;

4. Helping to identify institutions and programs for the investment of public and private funds;

5. Protecting an institution against harmful internal and external pressures;

6. Creating goals for self-improvement of weaker programs and stimulating a general raising of standards among educational institutions;

7. Involving the faculty and staff comprehensively in institutional evaluation and planning;

8. Establishing criteria for professional certification, licensure, and for upgrading courses offering such preparation; and

9. Providing one of several considerations used as a basis for determining eligibility for federal assistance.

During the past 20 years, there has been a substantial expansion in the federal role in the accreditation process. This trend has been the result of the development of federal student assistance programs as a major source of student and institutional income, and the resulting need for accountability in the distribution of these funds. Since 1952, the U.S. Commissioner of Education (now Secretary of Education) has had the responsibility of publishing a list of accrediting agencies deemed to be "reliable authority" as to the quality of training offered by educational institutions. Institutional eligibility for participation in federal programs requires that institutions not only be chartered or licensed by the state in which they operate but also either be accredited by one such recognized accrediting body or one of several alternatives to accreditation. In 1968, the Commissioner established a Division of Accreditation and Institutional Eligibility in the Office of Education to review the operation of accrediting agencies so that accreditation could be used as a major criterion to assess institutional quality and to reduce possible fraud and cheating in the distribution of federal funds. As the federal government has become increasingly involved in reviewing the policies and practices of accrediting agencies, the accrediting community has become increasingly uncomfortable with what it has viewed as unnecessary governmental involvement in the oversight of accrediting agencies (see, for example, Jacobsen, 1980).

ROLE AND STRUCTURE OF ACCREDITATION IN INSTITUTIONAL OVERSIGHT

The oversight of postsecondary education in the United States involves cooperative and complementary actions by the state governments, the federal government, and non-governmental accrediting agencies.

- The states have the ultimate responsibility for all education except that provided on military bases, which is a federal responsibility. This state role includes (1) the chartering or licensure of postsecondary institutions to operate; (2) the identification or approval of certain private postsecondary institutions as meeting specific requirements of educational quality; and (3) the licensure or certification of individuals to perform specific occupations and professions. For the second and third of these functions -- institutional approval and individual licensure -- California and most other states rely at least partially on the decisions of accrediting agencies. (The procedures and standards that California follows in approving non-public institutions are described on pp. 41-45 below.)

- The federal government has a more limited responsibility, as noted above -- that of assuring accountability and effective use of federal funds. To this end, the Secretary of Education has the responsibility to "recognize" accrediting agencies, with participation in federal funding programs limited largely to institutions that are either accredited by these agencies or active candidates for accreditation by them.

- The third element in this triad -- the accrediting agencies -- are typically nonprofit corporations consisting either of associations of institutions, such as the Western Association of Schools and Colleges, associations of professional practitioners, such as the American Bar Association, or councils of institutional and professional representatives, such as the Council on Social Work Education. Currently, some 70 agencies are recognized by the Secretary of Education and thus perform the function of identifying institutions eligible for federal funding. Under California law, eligibility to participate in State-related programs is limited to institutions that either are accredited by one of the accrediting agencies recognized by the Secretary of Education or are approved by the State Superintendent of Public Instruction on the recommendation of the Office of Private Postsecondary Education in the State Department of Education.

In addition to the accrediting agencies recognized by the Secretary of Education, a large number of accrediting associations have either not sought or been denied recognition. Some of these associations are clearly legitimate and have considerable effect on college campuses -- such as the American Chemical Society, which accredits professionally oriented chemistry programs in undergraduate colleges, the International Association of Counseling Services, and the National Athletic Trainers Association. However, since there are no federal or state restrictions on the establishment of accrediting agencies, several questionable organizations also exist to "accredit" colleges through a less than rigorous review process (Bear, 1982, pp. 39-41).

The essential feature of accreditation in relation to state and federal government is the orientation of their member institutions and individuals. If they are committed to making accreditation a mechanism for institutional self-improvement and self-regulation, then the association will have a positive impact on institutions, students, and the public. However, if they see institutional evaluation as something to be "dealt with," handled rapidly and infrequently, and otherwise ignored, accreditation will be ineffective in promoting, maintaining, and identifying educational quality. In short,

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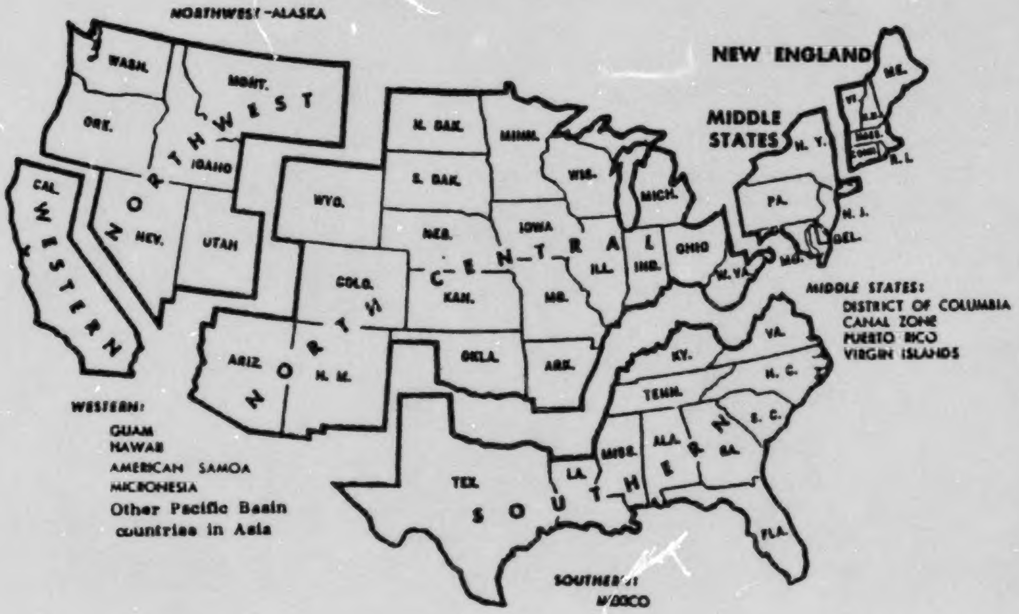
both the strength and weakness of non-governmental accreditation is that it functions only as effectively as member institutions and individuals want it to function.

All recognized accrediting agencies share common purposes, such as identifying institutions or programs that are considered successful in achieving their goals and meeting the standards of the accrediting body, and helping these institutions to improve their educational offerings. Most share similar procedures for institutional review, including periodic institutional self-study and on-site campus evaluation by a visiting committee. They also gain at least some financial support through dues or fees from accredited or applicant institutions. Despite these similarities, however, they differ substantially in other ways. Some agencies actively cooperate with others to coordinate data collection, site visits, and institutional self studies, while others work in virtual isolation. Some base their decisions on extremely detailed accreditation standards, such as the number of hours of instruction students receive in specific skill training, while others emphasize more general criteria, such as the achievement of institutional objectives. They differ also in their scope and focus of operation and can be separated into three distinctive types:

- The six regional accrediting associations, such as the Western Association of Schools and Colleges, that are depicted on the map below and that are recognized by the Secretary of Education for accrediting educational institutions in their respective regions.

FIGURE 1 Regional Accrediting Associations of the United States


NORTHWEST-ALASKA
NORTHWEST
WASH.
MONT.
ORE.
IDAHO
NEV.
UTAH
WYO.
CAL.
WESTERN
NEW ENGLAND
ME.
VT.
N.H.
MASS.
CONN.
R.I.
MIDDLE STATES
N. Y.
PA.
N. J.
DEL.
MD.
N. DAK.
MINN.
S. DAK.
WIS.
MICH.
NEB.
IOWA
ILL.
IND.
OHIO
W. VA.
COLO.
KAN.
MO.
NORTH CENTRAL
MIDDLE STATES:
DISTRICT OF COLUMBIA
CANAL ZONE
PUERTO RICO
VIRGIN ISLANDS
VA.
KY.
ARIZ.
N. M.
OKLA.
ARK.
TENN.
N. C.
S. C.
WESTERN:
GUAM
HAWAII
AMERICAN SAMOA
MICRONESIA
Other Pacific Basin countries in Asia
MISS.
ALA.
GA.
TEX.
LA.
SOUTHERN
FLA.
SOUTHERN:
MEXICO

- The four national institutional accrediting associations recognized by the Secretary of Education -- the American Association of Bible Colleges, the Association of Independent Colleges and Schools, the National Association of Trade and Technical Schools, and the National Home Study Council.
- And some 60 specialized programmatic accrediting agencies currently recognized by the Secretary for accreditation of college-level programs ranging from architecture and art to cytotechnology, engineering, medical record librarianship, music, public health, and social work.

The next three sections of this report discuss the relation of these three types of accrediting agencies to California institutions and State government.

REGIONAL INSTITUTIONAL ACCREDITATION IN CALIFORNIA

The Western College Association, established in 1924 as a forum for the discussion of common problems by representatives of California colleges, assumed the responsibility of accrediting California colleges and universities from 1948 until 1962. This responsibility was then transferred to the new Western Association of Schools and Colleges (WASC), which was formed to accredit colleges and universities, junior colleges, and secondary schools in California and Hawaii. The Western College Association has since expanded its membership to include accredited colleges from 13 western states and Guam, and continues to sponsor research and hold annual meetings to provide opportunities for discussion among educators.

The Western Association of Schools and Colleges, whose geographic service area now includes California, Hawaii, the territories of Guam and American Samoa, the Micronesian Islands, and American overseas schools in East Asia, is actually three separate accrediting commissions:

- The Accrediting Commission for Senior Colleges and Universities (often called the Senior Commission), which currently has accredited 132 four-year and graduate institutions;

- The Accrediting Commission for Community and Junior Colleges, which has accredited 140 one- and two-year postsecondary institutions; and

- The Accrediting Commission for Schools, which has accredited approximately 1,400 elementary, secondary, and adult schools.

All three commissions are recognized by the U.S. Secretary of Education, and the two postsecondary commissions are recognized by the Council on Postsecondary Accreditation. Each of the commissions develops its own standards, procedures, and fiscal policies, subject to the approval of the WASC Board of Directors, and appoints its own executive director. The Board of Directors consists of nine members -- three representatives from each of the Commissions.

The following paragraphs describe WASC's two postsecondary accrediting commissions, and Appendix C lists the institutions operating in California that were accredited by them as of February 1984. A description of its

Accrediting Commission of Schools appears in the California Postsecondary Education Commission's report 84-2, Improving College Preparatory Programs Through High School Accreditation" (January 1984)

Structure of the Senior and Community College Commissions

The two postsecondary commissions of the association differ in structure, with the Senior Commission centralized in authority and organization, while the Community College Commission is decentralized both in its appointive powers and authority.

Accrediting Commission for Senior Colleges and Universities: For the Senior Commission, the primary appointing authority is the Executive Committee of the Western College Association, which according to the WASC constitution may appoint at least six members, including representatives from the Pacific Basin, the Northwest Association of Schools and Colleges, and the general public. It has currently appointed 16 of all 18 members, three of whom represent the public. The other two members are ones appointed by the Junior College and School Commissions.

Accrediting Commission for Community and Junior Colleges: Fifteen members on the 17-member Community College Commission are appointed for three-year overlapping terms by the WASC Board of Directors from candidates nominated by a special nominating committee, with the Chancellor of the California Community Colleges and the President of the University of Hawaii each appointing one of the remaining members. The 15 members are expected to include at least five faculty members, three representatives of the public, one representative of independent institutions, one representative of Pacific Basin institutions, and a member of both the Senior and School Commissions. The special nominating committee, approved by the WASC Board in June 1984, consists of six members -- two faculty, two administrators, and two public representatives. The Commission chair appoints two of these members from the Commission. The Academic Senate for California Community Colleges, the California Chief Executive Officers, and the California Community College Trustees, respectively, appoint whatever additional faculty, administrative, and public members are required to complete the composition of the six-member committee.

As a result of these differences in the appointment process, faculty members are much more directly involved in the operation of the Community College Commission than in the Senior Commission because of their membership on both the nominating committee and the Commission. The use by the Community College Commission of a special nominating committee provides a formal process to involve the several constituencies of accreditation in the selection of Commissioners. In contrast, the selection process utilized by the Senior Commission concentrates considerable authority in the executive committee of the Western College Association from a region much larger than that covered by WASC and from an organization that has no involvement in accreditation or institutional review. Moreover, since the executive secretary of the Senior Commission also holds the position of executive secretary-treasurer for the Western College Association, he can exercise considerable influence in the selection of Commissioners and thus in the operation of the Senior Commission.

Purposes and Procedures of WASC Accreditation

The stated purposes of the Western Association of Schools and Colleges are:

> (1) to improve educational programs, (2) to foster close cooperation among the schools, colleges, and universities within its region, (3) to certify accreditation or candidacy status, and (4) to develop effective working relationships with other educational organizations (Andersen, Swenson, and Siverson, 1978, p. 386).

The Senior Commission's statement of purposes for accreditation are:

- To assure the educational community, the general public, and other organizations and agencies that an institution has clearly defined educational objectives appropriate to higher education and consistent with Commission standards, has established conditions under which achievement of these objectives can reasonably be expected, appears in fact to be accomplishing them substantially, and is so organized, staffed, and financed that it can be expected to continue to achieve these objectives.

- To foster integrity and excellence in higher education by developing and using standards for assessing educational effectiveness.

- To encourage institutional improvement through self-study and periodic evaluation by qualified professionals.

- Insofar as Commission resources permit, to promote honesty and integrity in institutional relations with students and other consumers, thus both supplementing state agency protection for the educational consumer and providing some protection for sound institutions.

- To promote cooperative efforts of public and independent institutions in opposing encroachments by governmental or other agencies that threaten to jeopardize educational effectiveness or academic freedom (Accrediting Commission for Senior Colleges and Universities, 1982, p. 1).

Four-year colleges and universities in California seeking accreditation by the Senior Commission must first have each degree program approved by the California Superintendent of Public Instruction pursuant to Section 94310(b) of the Education Code. They may then apply directly for accreditation or seek "candidacy for accreditation" from the Commission, after which they have a maximum of six years to become accredited.

One- and two-year institutions seeking Community College Commission accreditation must be approved by the Superintendent of Public Instruction or authorized by the Legislature to award degrees, diplomas, or certificates, and at least one-fourth of their units or courses for all degree programs must be in general education at the postsecondary level. After one year of candidacy, they may seek accreditation.

Procedures of both the Senior and Community College Commissions for initial accreditation as well as reaffirmation include the following steps:

- The institution prepares a self-study report following the criteria and guidelines provided by the Commission. Staff from the Commission provide some assistance to the institution during this phase.

- The Commission organizes a team of peer evaluators who review the self-study report and then make a site visit at the institution.

- During the site visit, the team meets with administrators, faculty, classified staff, and students; reviews additional materials provided by the institution; seeks to identify problem areas not discussed in the self-study report; assesses the quality of the educational program using standards provided by the accrediting agency; and makes an oral report to the administrators, faculty, and other staff about their initial conclusions. The formal recommendations of the team are not discussed with the institution at this time but are indicated on a confidential recommendation form.

- The team, under the direction of the chair, prepares a report with conclusions and recommendations, with the institution provided the opportunity to correct errors of fact. The final team report and the institutional response (if any) are then forwarded to the Commission.

- The Commission reviews the report and makes a determination for candidacy, accreditation, reaffirmation, deferral, warning, probation, show cause, denial or revocation of candidacy, or denial or withdrawal of accreditation, as appropriate.

- At the time of Commission action, the chief executive officer of the institution and the visiting team chair can appear before the Commission to discuss the report. The opportunity for institutional appeal comes only after final Commission action has been taken.

- Within ten years, the process is repeated, unless evidence exists to justify an earlier review. Between scheduled visits, the institution is expected to respond to the visiting team's recommendations and submit annual reports to the Commission. In addition, institutions on a ten-year cycle are required to file a fifth-year report, which for senior institutions may be followed by another visit and for Community Colleges must be followed by a visit.

Both the Senior and Junior Commissions "make public, when and as appropriate, through its Executive Director . . . the status of each institution subject to a negative action . . . . In all cases of negative action, the Commission will give the institution written reasons for its decision and will work with the institution on a statement for public release" (Accrediting Commission for Senior Colleges and Universities, 1982, p. 151).

Standards for WASC Accreditation

The accreditation standards utilized by the two WASC postsecondary commissions essentially represent a statement by the educational community itself on the issues and practices that underlie educational quality and institutional integrity. Each standard has been reviewed repeatedly before adoption by institutional representatives and then periodically revised as needed. For example, the standards that the Senior Commission adopted in 1979 were completely reviewed and substantially revised in 1981-82, leading to the current March 1982 version. The adoption of these formal accrediting standards has moved both Commissions away from evaluating institutions exclusively in light of their stated mission and toward providing a common foundation for all accrediting actions.

Accrediting Commission for Senior Colleges and Universities: The Senior Commission has nine standards for accreditation. These standards, which are excerpted in Appendix A, and with which its member institutions are expected to comply include: (1) institutional integrity, involving ethical principles and practices, commitment to academic freedom, and truth in institutional publications and representations; (2) clearly stated and distinctive purposes; (3) effective institutional governance and administration, including a clearly defined and substantive role for faculty; (4) quality in educational programs; (5) faculty and staff qualified by training and experience to work at the academic levels required by the institution's purposes; (6) current library,. computer, and other learning resources sufficient in quality, depth, and diversity; (7) adequate student services; (8) adequate physical resources, including instruction and support facilities; and (9) sufficient financial resources.

During the past six years, the Senior Commission has made several important revisions in these standards:

- The addition of the first standard on institutional integrity, directing institutions to demonstrate honesty in their relations with constituencies, including students and the public.

- The inclusion of language regarding the review of off-campus and other special programs -- "All off-campus and other special programs providing academic credit, whether leading to a degree or for non-degree purposes, are integral parts of the institution . . . . Institutional policies and procedures designed to assure and maintain high quality services off campus or in nontraditional modes are of utmost importance in accreditation and are a direct and unavoidable responsibility of every accredited institution . . . . The institution maintains direct quality and fiscal control of all aspects of all programs and provides adequate resources to maintain this quality."

- The addition of a policy statement regarding credit for prior experiential learning which provides that an institution must have a "well-defined philosophy regarding the awarding of credit, a clear statement on evaluation procedures, and a definitive plan to evaluate the amount of academic credit to be awarded."

- The revision of a policy regarding instructional contracts with unaccredited organizations, stating that accredited institutions are solely responsible for the academic and fiscal elements of all instructional programs and courses for which they provide credit.

- The addition to Standard Four of a specific requirement that in undergraduate programs, "normally, no more than one-half of the student's studies toward the baccalaureate degree is in the major field, with the rest of the program allocated to general education and electives." Standard Four also includes the provision that "the standards for academic credit are the same for degree and non-degree credit. Any work recognized by the institution as having standards different from those for academic credit is not classified as 'credit,' but offered as Continuing Education Units (CEUs) or under some other designation which clearly distinguishes such work from that offered by the institution for academic credit."

- The adoption of a policy statement on the purpose, content, and quality of baccalaureate education, as well as policy statements on collegiate athletics and collective bargaining.

Accrediting Commission for Community and Junior Colleges: The Community College Commission uses the ten standards summarized in Appendix B, which include: (1) clearly stated general goals and specific objectives consistent with the historical and legal mission of the public Community Colleges and appropriate to the usual functions of postsecondary education; (2) clear relation of the educational program to these objectives; (3) qualified faculty and staff; (4) adequate student services that "reflect an institutional concern for students' physical and mental health, developing their capacities and talents, motivating their educational progress, and helping them to relate to others in the campus community"; (5) policies and procedures of Community Colleges that encourage public use of facilities; (6) sufficient learning resources, including library materials, media equipment, and staff, to support all of the institution's educational offerings; (7) adequate physical resources; (8) sufficient financial resources to support institutional objectives, maintain program quality, and serve the anticipated number of students enrolled; (9) effective institutional governance and administration, including a governing board with broad policy responsibilities and a clearly defined faculty role in governance; and (10) effective system-wide governance of multi-college districts, including explicit objectives, definitions of system-college relationships, lines of authority, and assigned responsibilities.

During the past six years, the Community College Commission has made these important revisions in the standards:

- The revision, in January 1978, of a policy on postsecondary educational programs conducted by institutions on military bases.

- The addition, in June 1980, of a policy on credit for prior experiential learning in undergraduate programs that supports principles developed by the Council for the Advancement of Experiential Learning.

- The addition, in June 1981, of a statement on the transfer and award of academic credit designed to develop a common policy among Commission-accredited institutions for students who transfer between these institutions.

- Additions, in January 1982, of (1) a policy on collective bargaining that, while taking no position on the desirability of collective bargaining laws, directs accreditation teams to consider the impact of collective bargaining on the quality and effectiveness of institutions, and (2) a policy on collegiate athletics directing that athletic programs be conducted in a manner consistent with institutional objectives and educational mission.

Costs of WASC Accreditation

Accrediting Commission for Senior Colleges and Universities: Four-year colleges and universities seeking candidacy or accreditation by the Senior Commission must pay a one-time application fee of $2,000 plus all expenses for the visiting team during its evaluation. Their annual fees thereafter range from $800 for institutions with fewer than 100 full-time-equivalent students to $3,500 for institutions with more than 10,000 FTE students.

Accrediting Commission for Community and Junior Colleges: The evaluation service charges for one- and two-year institutions accredited by the Community College Commission range from $1,200 to $3,600 depending on enrollment and number of specialized programs. Annual fees range from $600 to $1,400 depending on enrollment.

The annual direct costs for WASC accreditation for the public colleges and universities in California is approximately $500,000. This estimate does not include the cost of staff time involved in the visits and the self-study report, as it is limited to the annual fees to the Accrediting Commission and the salaries and expenses of the visiting teams.

In a study completed in 1976 for the Senior Commission, Keith Warner surveyed presidents, chief academic officers, and other staff at 111 accredited senior colleges and universities in the western region. Among his findings was the fact that 62 percent of the chief academic officers and 81 percent of the presidents reported that the benefits of accreditation exceeded its costs, while only a small minority of each reported that its costs were greater than its benefits. More representatives of public and private religious institutions than of private-secular institutions reported that the benefits exceeded the costs, while somewhat more representatives of private-secular institutions reported either that the costs and benefits were equal or that the costs exceeded the benefits.

Cooperative WASC Community College Project

WASC's Accrediting Commission for Community and Junior Colleges initiated a joint project in 1981 with the Chancellor's Office of the California Community Colleges to improve the evaluation and planning capabilities of the State's public two-year colleges. The objectives of the three-year project, which is financed primarily by a grant from the Fund for the Improvement of Postsecondary Education are:

- to define the appropriate roles of State agencies and the Accrediting Commission in the evaluation of Community Colleges,
- to provide better evaluation and planning information for use by the colleges, the Commission, and the agencies, and

- to develop a plan for coordinated evaluation visits by the Accrediting Commission and the Chancellor's Office staff.

In response to the first objective, during 1982-83, the Accrediting Commission has assumed the responsibility of assessing the quality of each Community College, including the range, depth, and effectiveness of its programs and services, its governance, and how well it serves its students; while the Chancellor's Office has taken the responsibility of assessing the extent to which the colleges in the aggregate meet statewide objectives. This approach has been tested in 20 Community Colleges through a process that included (1) a college self-study during 1982-83 within the framework of both accreditation standards and statewide objectives, and (2) a visit to the college during 1983-84 by a team made up of both Accrediting Committee and State agency representatives. The current final year of the project is emphasizing both the improvement of planning capabilities at college and statewide levels and the formal assessment of the project generally.

The central thesis of the project has been that Community College programs and services should be evaluated locally; that each college and its district should be evaluated through accreditation; and that the Chancellor's Office and Board of Governors should assess what the districts and colleges are doing as a group with regard to State interests before making broad policy decisions affecting them. This approach emphasizes that the responsibility for assessing how well districts are meeting their own objectives rests with local boards of trustees, district staff, and accreditation agencies, and not with statewide agencies. According to the Board of Governors (1983), this approach will be reviewed by the Board during 1984 in preparation for Board adoption of a policy on comprehensive planning scheduled for June 1985.

NATIONAL INSTITUTIONAL ACCREDITATION IN CALIFORNIA

Four national associations recognized by both the U.S. Secretary of Education and the Council on Postsecondary Accreditation accredit specialized postsecondary institutions in California: the American Association of Bible Colleges, the Association of Independent Colleges and Schools, the National Association of Trade and Technical Schools, and the National Home Study Council. All four of these associations are similar to the regional associations in that they accredit entire institutions rather than specific programs. However, the postsecondary institutions they work with offer education either in limited areas -- bible colleges, business, or technical-vocational subjects -- or solely via correspondence.

American Association of Bible Colleges

The American Association of Bible Colleges (AABC) was established originally in 1947 as the Accrediting Association of Bible Institutes and Bible Colleges and adopted its current name in 1973. It accredits professional or special-purpose colleges in the United States and Canada whose function is "to prepare students for Christian ministries or church vocations through a program of biblical, general and professional studies" (AABC, 1980, p. 9). It has accredited approximately 80 institutions in North America, five of them in California. Among its stated purposes of accreditation are "to improve the quality of bible college education generally by describing as explicitly as possible standards of excellence, thus encouraging self-evaluation and stimulating continuous growth," and "to provide and circularize a list of approved colleges for the use of . . . various organizations interested in the educational ratings of schools and their students" (pp. 9-10).

The ten members of AABC's Accrediting Commission are appointed by the AABC Board of Directors for three-year terms and may be reappointed consecutively once. Nine of the Commission members are from accredited institutions, and the tenth public member is not employed by a bible college.

To be eligible to apply for accreditation by AABC, an institution must demonstrate a minimum of five years of continuous operation, a sound bible college program, and general continuity in administrative leadership, student enrollments, and faculty staffing.

AABC's accreditation standards are generally similar to those of other accrediting agencies, covering institutional objectives, administrative control, library and other institutional resources, curriculum, faculty and student life, and personnel. In many areas, however, they include more specific requirements than usual, such as regarding faculty qualifications ("the first graduate or professional degree beyond the bachelor's degree in the area of one's teaching field is normally considered the minimum in academic preparation") and college curriculum ("at least 30 hours of bible and theology is required of all programs leading to graduation"). As might be anticipated, particular emphasis is placed on institutional commitment to Christian principles and "the cultivation of Christian life and experience" (p. 72).

AABC's operations are funded through membership dues, with each accredited institution annually paying a minimum of $650 plus an additional amount dependent on the annual income of the institution. To fund an accreditation visit, the institution pays $750 plus the travel expenses of the visiting team members. Member institutions are expected to submit annual reports to the Association, and AABC visiting teams re-evaluate institutions either when the annual reports indicate that a re-inspection is advisable or approximately every ten years after membership is granted.

Association of Independent Colleges and Schools

The Association of Independent Colleges and Schools (AICS) was established in 1952 for institutions offering preparation for business careers in industry, government, or the professions. Its Accrediting Commission, which was initially recognized by the U.S. Commissioner of Education in 1956, currently accredits approximately 550 institutions nationally, including 52 in California. AICS views accreditation as an "independent appraisal of an institution during which its overall educational quality, its professional status, and its integrity is judged by its peers" (1982, p. 12). Its Accrediting Commission is composed of 11 members from accredited institutions who are elected by the total AICS membership and five public members who are appointed by the AICS Board of Directors. Members serve terms of three years, with two consecutive terms maximum.

Institutions that desire AICS accreditation must (1) be predominantly organized to train students for business careers; (2) have been in continuous operation for not less than two years; (3) have in operation at least one instructional program of not less than one academic year in length that is principally residential, on the postsecondary level, and leads to an occupational objective or an academic credential; and (4) be organized as a corporation.

AICS's accrediting standards include general provisions directing that (1) educational programs are consistent with institutional objectives and accompanied by adequate resources; (2) competent faculty are active in the total educational program of the institution; and (3) adequate resources are available for library and laboratory facilities. More specific standards are provided for business and specialized schools (regarding, for example, faculty teaching loads and library resources) and for junior and senior colleges (regarding, for example, degree requirements for the academic staff). For junior colleges awarding degrees in business, a minimum of 25 percent of their total 60 semester-hour program must be in general education. For senior colleges, 30 percent of the total 120 standard semester-hour program must be in general education.

AICS's accreditation process is the usual four steps of (1) the institutional self-evaluation, (2) on-site visit, (3) identification of institutional strengths and weaknesses by the team, and (4) action on the team report by the Commission. Accreditation is granted for a maximum period of six years for institutions "which are judged to be substantially in compliance with accreditation standards" (p. 29).

Institutional fees for AICS accreditation vary by the annual net tuition income of the institution. For example, schools with net tuition income between $50,000 and $100,000 pay an annual fee of $900, while those with income between $900,000 and $1,000,000 pay $2,400.

National Association of Trade and Technical Schools

The National Association of Trade and Technical Schools (NATTS) was established in 1965 to provide institutional accreditation for private residential schools offering occupationally oriented training in vocational and technical careers. It currently accredits some 623 vocational schools, approximately 90 of them in California. NATTS accreditation "is intended to be a means of (1) assisting good private trade and technical schools to become better schools; (2) assuring the public of high quality trade and technical education offered by private schools; and (3) setting standards to which all private trade and technical schools can aspire" (p. 1).

The NATTS Accrediting Commission is composed of nine members, five of whom are employed by trade and technical schools and four of whom are identified as "public persons" from outside the industry. The members are selected by the Association with the stated purpose of providing a balanced representation of "the interests of society generally and of the students and schools that are an inextricable part of the total educational scene."

NATTS accreditation process and standards are generally similar to those of other recognized agencies. Its typical visiting team consists of five members, including (1) a management specialist from an accredited school in a different geographical area and teaching non-competitive subjects; (2) an education specialist familiar with occupation instruction methods; (3) a subject specialist for each major occupational area for which training is offered; and (4) a representative of the Commission who facilitates the on-site review.

NATTS accreditation is awarded to institutions for a maximum of five years after which a new review is conducted. Institutions are also required to file annual reports with the Commission. Most NATTS-accredited institutions grant certificates or diplomas to their graduates, but those that award academic degrees must offer at least 25 percent of the curriculum in general education or in general education related to occupational subjects, and require a minimum of 60 semester hours for an associate degree or 120 semester hours for a baccalaureate degree. Those awarding occupational degrees are required to include at least 75 percent of the curriculum in occupational areas and admit only students having a high school diploma or the equivalent.

NATTS accreditation fees include the expenses of the visiting team during its review ($175 for each member for one day, plus $60 for each succeeding day). Institutional fees vary with the gross tuition of the institution, and Association members do not pay additional fees for reaccreditation expenses.

National Home Study Council

The National Home Study Council (NHSC) was established in 1926, but its accrediting was established in 1955. The Commission accredits both degree and non-degree granting correspondence institutions. Currently, approximately 80 institutions are accredited, 14 of which maintain their offices in California.

The Council defines its accreditation as "certification by a recognized body that a school has voluntarily undergone a comprehensive study and examination which has demonstrated that the school does in fact perform the functions that it claims . . . " (1980, p. 2). Its Accrediting Commission, composed of four senior executives of accredited home study schools and five members selected to represent the public, is the only nationally recognized accrediting agency with a majority of public members. Membership terms are three years long, with the public members limited to three terms and the industry representatives limited to two.

The NHSC accreditation process includes (1) the preparation of a self-evaluation report; (2) a review and evaluation of all courses by subject matter specialists selected by the Commission; (3) a survey of state departments of education, consumer agencies, federal agencies, and randomly selected former students to ascertain the school's reputation; (4) a visit to the school by an examination team; (5) the preparation of a team report; and (6) review and action on the report by the Accrediting Commission. Institutions are expected to submit annual reports to the Commission, and they are re-examined every five years unless a change of ownership or evidence of serious problems indicate a need for more immediate review.

NHSC standards for accreditation include general provisions concerning institutional objectives, instructional materials, qualified faculty, institutional financial resources, as well as more specific provisions concerning tuition refund policies, advertising and promotional literature, training and control of sales representatives, and admission policies.

Each school accredited by NHSC pays an annual fee based on its total cash receipts from home study enrollments during the preceding calendar year, plus annual membership dues.

SPECIALIZED ACCREDITATION IN CALIFORNIA

Specialized accreditation (also known as professional or programmatic accreditation) involves the approval of specific programs, disciplines, or curricula within postsecondary institutions, rather than approval of the entire institution. All specialized accrediting agencies recognized by the Secretary of Education are national in scope, but the number of programs they have accredited vary considerably, from fewer than 25 in the fields of construction education and osteopathy to more than 500 in nursing, teacher education, and music.

Thirty-four specialized associations recognized by the United States Secretary of Education accredit programs in colleges and universities in California. These associations range from the Foundation for Interior Design Educational Research, which accredits a program at one college, to the Committee on Allied Health Education and Accreditation, which accredits programs at 49 different colleges and universities in the State. Table 2 on pages 31-32 lists these associations and indicates the number of California programs that they have accredited.

Specialized accrediting agencies differ among themselves primarily in terms of their membership or sponsoring organization. Some, such as the National Association of Schools of Art and Design and the Association of Theological Schools in the United States and Canada are associations of institutions organized primarily for the purpose of accreditation. They tend to be similar to regional accrediting associations in philosophy and policy about the functions of accreditation. However, the majority of specialized accrediting agencies are sponsored by and related to associations of individual members of professions, such as the American Bar Association, the American Dental Association, and the American Library Association. The remainder are jointly sponsored by individual and institutional associations and include the National Architectural Accrediting Board, the Council on Education for Public Health, and the National Council for the Accreditation of Teacher Education, which has ten constituent member organizations, among them the American Association of Colleges for Teacher Education and the National Education Association.

This difference among specialized accrediting agencies in sponsorship results in differences of influence, with associations of institutions tending to involve educators in decision making and individual-membership organizations tending to involve professional practitioners. As a result, according to

TABLE 2 *Specialized Accrediting Associations Recognized by the United States Secretary of Education and Operating in California*

Association, Year Accreditation Undertaken, and Scope of Accreditation	Number of California Colleges Where Programs Were Accredited, 1982
Accreditation Board for Engineering and Technology, Inc., (1932) accredits engineering and engineering technology programs in the United States, Puerto Rico, and American territories and possessions.	26
Accrediting Commission on Education for Health Services Administration (1968) accredits graduate programs in health administration in the United States and Canada.	2
Accrediting Council on Education in Journalism and Mass Communication (1945) accredits professional journalism programs at the undergraduate and master's degree levels in the United States.	7
American Assembly of Collegiate Schools of Business (1919) accredits baccalaureate and master's degree programs in business administration and management in the United States and Canada.	19
American Association of Nurse Anesthetists (1931) accredits programs in nurse anesthesiology through graduate levels in the United States.	2
American Bar Association (1923) accredits law schools in the United States.	15
American Board of Funeral Service Education (1946) accredits programs in funeral service education on the certificate, associate degree, and baccalaureate degree levels in the United States.	2
American Council on Pharmaceutical Education (1932) grants accreditation to programs leading to the first professional degree (baccalaureate or doctorate) in pharmacy.	3
American Dental Association (1940) accredits: (1) dental education programs; (2) dental specialty programs; (3) dental hygiene education programs; (4) dental assisting education programs; and (5) dental laboratory technology education programs in the United States. A reciprocal agreement with the Council on Education of the Canadian Dental Association provides for recognition of Canadian education programs accredited by that agency.	37
American Dietetic Association (1927) accredits coordinated undergraduate programs in dietetics and post-baccalaureate degree internship programs in the United States and its territories.	9
American Library Association (1924) accredits programs in librarianship leading to the first professional degree in the United States and Canada.	4
American Medical Record Association (1928) accredits programs in medical record administration and medical record technology in the United States and its territories.	6
American Occupational Therapy Association (1917) accredits educational programs for occupational therapists in the United States.	3
American Optometric Association (1934) accredits professional programs in optometry (O.D.), associate degree optometric technician programs, and optometric residency programs in the United States and Canada.	2
American Physical Therapy Association (1921) accredits associate degree through graduate programs for physical therapists and assistance in the United States.	8
American Podiatry Association (1912) accredits colleges of podiatric medicine, residency, and assistant programs, and continuing professional education programs in the United States, and Canada.	1
American Psychological Association (1952) accredits doctoral training programs in professional psychology and pre-doctoral internship training programs in clinical and counseling psychology in the United States and Canada.	3
American Society of Landscape Architects (1899) accredits baccalaureate degree and graduate degree programs in landscape architecture in the United States and Canada.	2

BEST COPY AVAILABLE

BEST COPY AVAILABLE

TABLE 2, Continued

Association, Year Accreditation Undertaken, and Scope of Accreditation	Number of California Colleges Where Programs Are Accredited
American Speech-Language-Hearing Association (1925) accredits master's degree programs in speech language pathology and/or audiology in the United States and Canada.	11
American Veterinary Medical Association (1863) accredits programs leading to the first professional degree (DVM or VMD) in veterinary medicine in the United States and Canada.	7
Association of Theological Schools (1918) accredits free standing theological seminaries and schools, or schools/departments within institutions offering graduate programs in education for ministry/priesthood in the United States and Canada.	16
Committee on Allied Health Education and Accreditation (1933) accredits post-secondary programs in 25 areas of allied health ranging from the certificate/diploma level through the baccalaureate level and/or graduate certificate level throughout the nation.	49
The Council on Chiropractic Education (1971) accredits institutions offering professional degrees in chiropractic education in the United States.	2
Council on Education for Public Health (1974) accredits graduate schools and programs of public health in the United States.	5
Council on Social Work Education (1952) accredits baccalaureate and master's degree programs of schools of social work in the United States and Canada.	13
Foundation for Interior Design Education Research (1971) accredits programs in interior design and interior architecture from the junior college through the graduate levels in the United States.	1
Liaison Committee on Medical Education of the Council on Medical Education of the American Medical Association and the Executive Council of the Association of American Medical Colleges (1942) accredits all programs in medical education leading to the M.D. degree. Prior to 1942, beginning in the late nineteenth century, medical schools were reviewed and approved separately by the AAMC and the AMA. The American Medical Association also accredits programs in two-year institutions.	47*
National Architectural Accrediting Board, Inc., (1940) accredits first professional degree programs in architecture in the United States.	4
National Association for Practical Nurse Education and Service, Inc., (1941) accredits basic (certificate/diploma) programs and post-basic courses in practical/vocational nursing in the United States and its territories.	35
National Association of Schools of Art and Design (1944) accredits institutions and units (departments/programs) within institutions which offer associate, baccalaureate, and/or graduate degree programs in art, design, and related disciplines.	15
National Association of Schools of Music (1924) accredits institutions and programs which offer associate, baccalaureate, and degree-granting programs in music and music-related disciplines.	24
National Council for Accreditation of Teacher Education (1954) accredits baccalaureate and graduate degree progams for the preparation of teachers and other professional school personnel in the United States.	14
National League for Nursing, Inc., (1952) accredits programs in nursing from the diploma through the graduate levels in the United States.	37
Society of American Foresters (1900) accredits programs which culminate in a first professional degree (B.A. or higher) in forestry in the United States.	2

*Includes programs accredited by the AMA at the Community Colleges.

Source: The Council on Postsecondary Accreditation, 1983a, and U.S. Department of Education, 1980a.

Robert Glidden, "one review is likely to be oriented more toward the interests of the institution and the other toward the interests of the profession.

Certainly, one of the principal causes of tension that is reported between institutional leaders and specialized accreditation is the question of who is being served by the accreditation process, the institution or the profession" (1983, p. 196).

Procedures of Specialized Accreditation

All specialized accrediting agencies generally use the same procedure in reviewing and accrediting programs as other recognized accrediting agencies (Petersen, 1979, pp. 74-99). However, unlike the six regional associations that evaluate institutional performance primarily in terms of institutionally stated objectives, they are more concerned with program compliance with national standards established to assure adequate professional preparation. All specialized accrediting agencies require institutional self study, but some impose the use of quite specific self-study guidelines, leading Glidden to comment, "one of the commonly heard complaints about specialized accreditation is that self-study requirements are excessive, calling for information and particularly quantitative data that are superfluous to the task at hand" (p. 198). On-site visits, which may involve anywhere from two to nine or more participants, may cost the institution between $1,500 and $2,000 in direct expenses. Length of accreditation averages five years but varies considerably among the agencies, ranging from a maximum of ten years for at least six agencies to only one year for two agencies.

Issues Regarding Specialized Accreditation

Considerable disagreement exists in the education community about the overall merits of specialized accreditation. The Council on Postsecondary Accreditation endorses specialized accreditation in certain fields, stating that "specialized accreditation exists primarily for the purpose of providing some assurance to the public of the quality of the education professionals receive, a responsibility for which members of an organized or licensed profession have traditionally been held accountable" (1981, p. 1). However, some leaders in postsecondary education argue that since specialized accreditation does not actually assess the competency of individuals who complete professional programs, institutional accreditation should suffice for attesting to the quality of an institution's total offerings, while professional associations should abandon specialized accreditation and concentrate on improving the licensing, certification, and continuing education of practitioners (Carnegie Foundation for the Advancement of Teaching, 1982, pp. 78-79). Such disagreements about specialized accreditation are substantial and relate to the following issues:

- Professional associations tend to view accreditation as one of several tools for protecting and promoting the status of the profession and its practitioners. Emerging specialties may view accreditation of their programs as a means to gain leverage for resources within institutions, while established professions may see it as a means of retaining leverage, since more faculty, facilities, equipment, or higher salaries can be cited as necessary for meeting and maintaining accreditation by the agency. Critics of accreditation argue that, in this way, programs in fields with specialized accreditation may gain considerable power over other fields in decisions about the allocation of resources within institutions. On the other hand, supporters of specialized accreditation argue that specialized accrediting associations generally exist in occupational or professional fields in which educational programs are designed to prepare persons for effective entry-level practice or employment. The integrity of such programs is at stake in a unique way, since the health, welfare, and expectation of the public regarding professional proficiency are involved. The role of specialized accreditation is thus to identify occupational or professional programs with sufficient resources to prepare practitioners adequately for the fields in question. If an institution has inadequate resources, the choice facing it is to either give greater priority to the field in order to attain the expected level of professional preparation or else get out of the field. Part of the function of specialized accrediting associations, therefore, is to call attention to the fact that some institutions offer inadequate occupational or professional programs.

- College and university officials express concern about the increasing number of specialized accrediting agencies. The Council on Postsecondary Accreditation currently recognizes 37 specialized agencies -- only one more than the number recognized by the National Commission on Accrediting, one of COPA's forerunners, in 1975 -- but during the past five years, more than 70 new specialized professional groups have inquired of COPA about applying for its recognition as accrediting agencies. Moreover, as noted above, 60 agencies are now recognized by the Secretary of Education for specialized accreditation. (These numbers would appear to indicate a great difference in the number of specialized agencies recognized by COPA and the Secretary of Education, but the numbers are in fact relatively close. The Secretary of Education separately recognizes all 16 Joint Review Committees under the Committee on Allied Health Education and Accreditation, while COPA recognizes the Committee as a single, umbrella agency. If COPA counted the Review Committees separately, its total would increase to 53.)

- Specialized accreditation is not a totally voluntary option for postsecondary institutions in those fields where graduation from an accredited program is a requirement for individual licensure to practice. These institutions feel pressure to offer programs that qualify their graduates to sit for the licensure examination.

- The costs of multiple specialized accreditation are high, particularly when faculty and staff time in the preparation of self-study reports are added to association membership fees and the expenses of site visits. Among respondents to a recent opinion survey about accreditation conducted for COPA, only 22 percent of the 483 presidents or chief academic officers and only 16 percent of the 1,167 program heads agreed that "accreditation is too costly for what it accomplishes (Pigge, 1979, p. 33). However, costs could be reduced through greater cooperation and coordination among agencies, particularly for universities that offer a number of specialized programs eligible for accreditation.

- Specialized accreditation standards are often criticized as unnecessarily quantitative, thereby inhibiting educational innovation and experimentation and restricting institutional autonomy. A 1979 COPA study concluded that the standards which particularly infringe on institutional autonomy include requirements on specific numbers of faculty members, faculty-student ratios, and faculty teaching loads (Petersen, 1979, p. 155). And in a recent report on "The Control of the Campus," the Carnegie Foundation stated that "the issue here is not whether professional programs should meet high academic standards. It is, rather, how detailed those standards should be; how they should be enforced; and most importantly, whether specialized programs are to fit within the larger purposes of the campus" (1983, p. 78).

Issues such as these are of concern not only to educators and the accrediting agencies but also increasingly of the non-governmental and government agencies that oversee and rely on accreditation.

ACCREDITATION OF LAW SCHOOLS IN CALIFORNIA

California is one of six states that does not require graduation from a law school approved by the American Bar Association (ABA) as a requisite for admission to the bar (Georgia, Indiana, Vermont, Washington, and Wyoming are the other five). This is one of the major reasons why non-accredited law schools developed in California to a much larger extent than in most other states. To provide an alternative to ABA accreditation, California has developed its own accrediting program through the Committee of Bar Examiners of the State Bar of California. Consequently, there are three types of law schools in California: those accredited by the ABA (16 institutions); those accredited solely by the Committee of Bar Examiners (18 institutions); and 16 non-accredited law schools. Law schools which are either provisionally or fully accredited by the ABA are automatically accepted as fully accredited by the Committee of Bar Examiners. Consequently, there are technically 34 institutions accredited by the Committee of Bar Examiners.

The American Bar Association

The first accreditation standards for law schools were adopted by the ABA in 1921. Its Accrediting Committee of the Section of Legal Education and Admissions to the Bar was established with the responsibility to recommend and "effectuate measures for the improvement of the systems of pre-legal and legal education in the United States; methods for inculcating in law students the sincere regard for the ethics and morals of the profession necessary to its high calling; and means for the establishment and maintenance in the several states of adequate and proper standards of general education, legal training, and moral character of applicants for admission to the Bar . . . ." (American Bar Association, 1983, p. i). The 13-member Accrediting Committee is composed of six members from accredited institutions, two professional practitioners, two public members, two State Supreme Court justices, and one State Superior Court judge. Members are appointed by the chair of the Council of the Section of Legal Education and Admissions to the Bar for one-year terms, with an unlimited number of terms permitted.

Currently, 173 law schools in the nation are accredited by the ABA, with almost one-tenth of them in California. Schools that desire ABA accreditation must (1) operate as a non-profit educational institution, (2) have completed the first academic year of its program, and (3) if they are for university-based, be housed in a regionally accredited institution. The ABA's accrediting standards include specific provisions in the areas of educational programs, faculty, admissions, library, physical plant, and principles of academic freedom and tenure. Among these standards are the requirements that a school (1) not grant credit for study by correspondence, (2) not offer to students, for academic credit or as a condition to graduation, instruction that is designed as a bar examination review course, (3) employ no fewer than six full-time faculty members, in addition to a full-time dean and a full-time law librarian, (4) maintain a law-school library that contains all of the publications and materials identified by the Accrediting Committee as necessary for the proper conduct of an educational program, (5) provide each full-time faculty member with a private office, and (6) assure study space in the law school library for at least 50 percent of day-school enrollment or 35 percent of evening-school enrollment.

ABA's accreditation process consists of (1) completion of a comprehensive feasibility study by institutions not yet accredited or a self-study by institutions undergoing reaccreditation; (2) on-site inspection usually lasting four days by a four-member team; (3) distribution of a written team report to members of the Accrediting Committee, with the chief executive officer of the institution receiving a copy to confirm its accuracy; and (4) action on the application first by the Accrediting Committee and second by the House of Delegates of the ABA.

The Committee of Bar Examiners of the State Bar of California

The Committee of Bar Examiners of the State Bar of California was established in 1927 through the passage of the State Bar Act. The State Bar of California is a public corporation, and the Committee of Bar Examiners is the part of the corporation empowered to accredit law schools in California. The nine lawyer members of the 11-member Committee are appointed by the Board of Governors of the State Bar. The two non-lawyer members are appointed by the public members of the Board of Governors of the State Bar. Law schools are not represented on the Committee.

To be accredited by the Committee, "a law school shall establish that its paramount objective is to provide a sound legal education and that it is accomplishing that objective. It shall do so by showing that it substantially complies with the standards" established by the Committee (Committee of Bar Examiners, 1983, p. 1). These 11 standards appear in "Rules Regulating Admission to Practice Law in California" as Rule XVIII. They include provisions regarding an adequate library and physical plant, a sound educational program and admission policy, and a competent administrative head and faculty; and they include the statement that "preferably, the school shall not be operated as a commercial enterprise or for private profit. In no event shall a school permit profit considerations to dictate the quality of education the school provides . . ." (Standard A, Section 182).

An institution that desires accreditation by the Committee must first be authorized by the State Superintendent of Public Instruction to award degrees in California. It must then file a written petition stating that it is complies with the Committee's standards and submit any other information requested by the Committee. It is then inspected by a Committee consultant, with members of the Committee participating in the visit. The consultant files a written report with the Committee, and the school has the option of commenting on the report prior to Committee review. The Committee does not charge accreditation fees, but the school must reimburse the State Bar for the actual expenses of the inspection visit or any consultation.

During the past ten years, the Committee has not withdrawn accreditation from any accredited school. Upon initial grant of accreditation, a school is on annual inspection until the further order of the committee and an accredited school may be put on annual inspection if there is cause for believing the school is not complying with the standards. Accredited schools are visited at least once every five years. Its accreditation processes and decisions are subject to review by the Supreme Court of California, but thus far, only one school has petitioned the Supreme Court for review of the Committee's determination, and its petition was denied.

Besides its accrediting function, the Committee of Bar Examiners also has responsibility for the "oversight" of non-accredited law schools and correspondence law schools which operate in California. It requires these schools to (1) file an annual report, (2) file a certification of all persons admitted to the institution for each academic period, (3) maintain specified student records, and (4) be open to visitation and inspection by the Committee at any time that the school is open for any purpose. If the Committee decides that the school is not in compliance with the requirements of Supreme Court Rule 957 and Rule XIX of the "Rules Regulating Admission to Practice Law in California" and is not taking action to move into compliance, it has the authority to publish its findings and send them to students enrolled in the school, to the Supreme Court of California, and to the Attorney General.

Four important differences exist between the Committee of Bar Examiners and other major accrediting associations operating in California in terms of structure and operation.

- First, in contrast with other associations, the Committee is not recognized and has not sought recognition by either the Secretary of Education or COPA. Consequently, students attending institutions accredited solely by the Committee are not eligible for federal student financial assistance programs. (Such students are eligible, however, for State-funded graduate fellowships.)

- Second, representatives of accredited schools are included in all accrediting associations except the Committee of Bar Examiners.

- Third, law schools are limited to petitioning the California Supreme Court for review of a Committee of Bar Examiners determination, whereas if other accrediting agencies appear to violate their criteria or procedures in denying or terminating accreditation, an institution may appeal for review to COPA as well as the Superior Court.

- Fourth, the Committee of Bar Examiners is the only accrediting association in California created by statute and functioning clearly as a quasi-governmental agency.

NON-GOVERNMENTAL OVERSIGHT OF ACCREDITATION

Non-governmental review and coordination of college- and university-level accreditation is the function of the Council on Postsecondary Accreditation (COPA), the educational community's accrediting agency of accrediting agencies, which was created in 1975 by a merger of the Federation of Regional Accrediting Commissions of Higher Education and the National Commission on Accrediting. Despite some success in limiting the proliferation of new specialized accrediting agencies, the National Commission on Accrediting had functioned as a rival to the loose national confederation of the six regional accrediting bodies. By the 1970s, it was increasingly clear that some type of strong overarching national organization for all accreditation was needed in order to avoid expanding federal and state governmental involvement in postsecondary education. It was within this context that COPA came into being (Puffer, 1970).

As a non-governmental organization, COPA works to "foster and facilitate the role of accrediting agencies in promoting and insuring the quality and diversity of American postsecondary education" (1982, p. 3). More specifically, its objectives are to:

- recognize accrediting associations that accredit institutions and programs of postsecondary education on the basis of demonstrated need and specified standards

- provide national leadership for and understanding about postsecondary accreditation

- provide services to the accrediting associations, postsecondary educational institutions, and the public through such activities as sponsoring and conducting research and facilitating coordination among accrediting associations (1982, p. 4).

The governance of COPA involves shared authority among groups that frequently have divergent interests: the regional and national institutional accrediting agencies, specialized accrediting agencies, national postsecondary organizations, chief executive and academic officers of postsecondary institutions, and representatives of the public. COPA first sought to represent these varied interests through a 40-member governing board but in 1981 moved to a more efficient 19-member board and a five-member Executive Committee. Its funding comes primarily from annual dues of accrediting agencies it has recognized and member national postsecondary organizations.

During the initial years of COPA's operations, its governing board identified five priorities for attention:

- dealing with the problems of proliferation and specialization of accreditation

- evaluating educational quality and assessing educational outcomes

- coping with the role of federal and state government in accreditation

- establishing a nationwide education-information program on accreditation

- selecting, training, and evaluating individuals who would volunteer to work in accreditation visits (Council on Postsecondary Accreditation, 1979, p. 7).

Regarding the first of these priorities, since its creation, some 120 groups have expressed interest in gaining COPA's recognition as an accrediting body. According to Charles Chambers, former acting president of COPA, "all these organizations have been advised by COPA's staff that their aspirations are premature, in one way or another, and that they are so grossly out of compliance with key COPA provisions that recognition would probably not be granted" (Chambers, 1983, p. 402). However, since COPA recognition is voluntary, many of these groups have actually started accrediting without its approval simply by establishing their own eligibility requirements and seeking invitations to visit campuses. (An example is the National Association for Private Nontraditional Schools and Colleges, which has accredited California-based degree-granting institutions among its dozen or so members.)

COPA's position concerning the establishment of new accrediting agencies is threefold: (1) a need must be demonstrated for any new accrediting agency; (2) every program within an institution does not need to be accredited; and (3) the time demands, costs, and conflicts of multiple accreditations should be minimized. Agencies seeking COPA recognition must successfully complete a two-phase preapplication process prior to making formal application. In the first phase of the process, the agency is encouraged to demonstrate in some detail the need for accreditation in its field. If it can do this satisfactorily, it is encouraged in Phase II to demonstrate its accrediting capacity; otherwise it is discouraged from continuing further. Since completion of the preapplication process is a requisite for formal application to COPA, relatively few agencies actually apply for COPA membership. Technically, only one agency has applied for recognition during the past four years -- the Association for Advanced Rabbinical and Talmudic Schools, which was granted recognition in 1982. However, since 1982, 16 agencies have expressed serious interest in seeking COPA recognition, and four of these are currently in the preapplication process.

Regarding its second priority, COPA has worked on the issue of evaluating educational quality with emphases on nontraditional education, off-campus programs, and graduate education. It received funding from the W. K. Kellogg Foundation to study the accreditation of nontraditional education and concluded that accrediting bodies should expand their assessment of educational outcomes and use the same approach for all types of institutions and programs, whether conventional or nontraditional. It has also developed policy guidelines for use by the Department of Defense and the regional accrediting commissions in reviewing off-campus programs on military bases.

COPA has also played an active role in seeking to delimit and clarify the federal and state roles as they affect non-governmental accreditation. For example, in 1974, the Office of Education had begun to require that for continued recognition, accrediting associations demonstrate their capability and willingness to "foster ethical practice such as nondiscrimination and equitable tuition refunds, encourage experimental and innovative programs, and include representatives of the public in . . . decision making" (Federal Register, 1974), despite the fact that no statutory authority existed for these requirements. Through COPA, the accrediting associations have resisted this federal government requirement while at the same time placing greater emphasis themselves on monitoring the ethical practices of postsecondary institutions as a means to avoid further federal intrusion in postsecondary operations.

Thus far, COPA has not made as much progress on its other priorities of establishing a nationwide effort to explain the role and value of accreditation and designing a large-scale effort to train volunteers for accreditation visits. Nonetheless, during its eight years of operation, it has demonstrated that it can play an important role in the non-governmental oversight of accreditation, seeking to balance the roles of institutional and specialized accrediting agencies and providing assurance that its recognized agencies fulfill an appropriate need and meet established criteria designed to protect the integrity of postsecondary institutions. It has achieved this success despite the fact that it functions both as an advocate for and monitor of accrediting bodies and despite its significantly different influence in comparison with that of the Secretary of Education regarding agency recognition. Its recognition is voluntary and signifies peer approval of the agency by other members of the academic and accrediting communities, whereas recognition by the Secretary of Education is directly related to institutional eligibility to receive federal funds and is, therefore, a mandatory governmental review if an institution desires federal funds. Thus being recognized by the Secretary of Education as a "reliable authority as to the quality of training offered by an educational institution" presents new accrediting associations with an expedient route to achieving national acceptance and reputation without seeking COPA recognition.

As might be expected, some associations thus tend to organize themselves to match federal regulations and guidelines rather than those of COPA and spend considerable time, effort, and money to get on the government's recognized list. According to Charles Chambers, ambitious associations prepare documents "in the form required by federal staff so that a satisfactory recommendation for listing will be forthcoming. Regardless of the social need for a new accrediting body or its commitment to the educational and public sector mission of accreditation, its bylaws, handbooks, standards, and review procedures can be made to contain all the right words, be arranged in the right order, and be presented in the right fashion. This approach is clearly only a pantomine of academic principles" (1983, p. 354). In short, the impetus for them to seek COPA recognition through responding to demonstrated educational needs has been replaced by seeking to achieve influence through federal recognition.

In addition, since the federal government and COPA do not recognize all the same agencies -- with the Cosmetology Accrediting Commission, for example, recognized only by the Secretary of Education and the American Council for Construction Education recognized only by COPA -- questions naturally exist about the reliability and quality of those agencies recognized by only one. Some accrediting associations recognized by COPA have chosen not to seek federal recognition since they operate in areas in which federal recognition for funding purposes is not relevant. Of the accrediting associations recognized by the federal government but not by COPA, at least three are not eligible for COPA recognition because they are not clearly postsecondary.

In the late 1970s, the Carter Administration sought to sever the link between accreditation and institutional eligibility for federal funds by basing eligibility entirely on other criteria than accreditation. Its efforts were opposed and ultimately defeated, however, through vigorous lobbying by accrediting agencies -- despite their complaints about their quasi-governmental role because of this link. Today, both federal officials and those of accrediting agencies and COPA acknowledge significant problems with the current arrangement of separate federal and COPA recognition, but there seems to be a general commitment to work for the improvement of the current relationship rather than attempting to establish an entirely new one.

During the past two years, COPA, in cooperation with the State Higher Education Executive Officers Association (SHEEO) has initiated an important project concerning the utilization of telecommunications in the delivery of postsecondary education services. The primary objective of the Project on Assessing Long Distance Learning Via Telecommunications (Project ALLTEL) is to develop a set of common standards and policies by which accrediting and State authorizing agencies can review educational programs delivered by electronic media. This project, which is supported by a grant from the Fund for the Improvement of Postsecondary Education (FIPSE) should be completed in 1984, and provide the basis for both reasonable and consistent regulation by State oversight agencies of the new technologies, as well as a process for quality assurance and self-regulation through non-governmental accreditation.

COPA has received a grant from the Ford Foundation to work with accrediting associations on the development of a common data base for use in connection with self-studies and institutional and program reporting. The three-fold objective of this common data base is to (1) reduce the cost to institutions of different forms of data requests, (2) help institutions internalize both the institutional and professional accrediting processes, and (3) facilitate interagency cooperation. COPA has also established three different task forces to work on the issues of validity and reliability, disclosure and confidentiality, and institutional and association rights and responsibilities in the accrediting process.

CALIFORNIA STATE REVIEW OF DEGREE-GRANTING INSTITUTIONS

Independent and private institutions in California are eligible to award academic degrees if they meet one of three requirements: (1) accreditation by a national accrediting association recognized by the United States Secretary of Education, by the Western Association of Schools and Colleges, or by the California Committee of Bar Examiners; (2) approval by the State Superintendent of Public Instruction; or (3) authorization by the Superintendent. (Summary information about these three classifications is provided on Table 3 below.) As discussed below, the authorization provision has historically existed in California as a means by which both new educational institutions can be started and existing institutions can operate with little or no governmental oversight. The approval provision is the highest level of State review, with an assessment made of the overall quality of each program. As discussed previously, the accreditation provision allows an institution to substitute periodic peer review through an accrediting association for review by the State oversight agency -- the Office of Private Postsecondary Education in the Department of Education.

TABLE 3 Provisions for Degree-Granting Authority in California by Private Postsecondary Education Institutions as of January 1984

Provision	Accreditation	Approval	Authorization
Agency Responsible for Oversight	1. A nationally recognized accrediting association; 2. Western Association of Schools and Colleges 3. California Committee of Bar Examiners	California State Department of Education, for the Superintendent of Public Instruction	California State Department of Education, for the Superintendent of Public Instruction
Type of Review	Institutional	Programmatic	Institutional
Components of the Review Process	Self study; peer evaluation; quality assessment through the use of standards developed by member institutions	Self study; peer evaluation; quality assessment through use of practices and standards of accredited institutions as as criteria	Full disclosure statement; verication of truthfulness and accuracy of this statement, but no evaluation or quality assessment
Length of Time Recognition Granted by the Agency	Ten years	Three years	Three years
Number of Institutions Involved	185 institutions are currently accredited	69 institutions currently offer approved degree programs	190 institutions are currently authorized

Source: Office of Private Postsecondary Education, California Department of Education.

The approval process by the Department of Education involves the review of the institution and the certification that it has the facilities, financial resources, administrative capabilities, faculty and other educational expertise and resources necessary for the degree programs. Education Code Section 94310(b) states that the Superintendent shall determine both that "the curriculum is consistent in quality with curricula offered by established institutions" and "the course for which the degree is granted achieves its professed or claimed objective for higher education." As of January 1984, 69 institutions have been reviewed by the Superintendent and approved to grant degrees pursuant to this section of the law.

The yardstick utilized by the State Department of Education in the evaluation of educational programs is the practices and standards of "accredited institutions of higher education, public and private, which offer similar programs" (California State Department of Education, 1982, p. 21). Five criteria for approval are stipulated in the law and developed in more detail in the Administrative Code which the Department uses in its evaluation (California State Department of Education, 1979, p. 7):

(a) Financial Stability. The institutions shall maintain assets sufficient to ensure capability of fulfilling the specific program to enrolled students.

(b) Faculty. Faculty resources shall include personnel who possess degrees from United States Office of Education recognized accredited institutions in the proposed degree major fields(s) and in sufficient number to provide the proposed educational services.

(c) Course of Study. The educational services shall clearly relate to the proposed degree(s) objectives, be comparable in scope and sequence to minimum standards of comparable degree programs in accredited institutions recognized by the U.S. Office of Education, and shall, in the judgment of the visiting committee, ensure quality educational services to the degree candidate.

(d) Facilities. Facilities must relate to the defined degree objectives. The stated educational services define the needed facilities, and the visiting committee must express a judgment that the facilities available are sufficient to ensure the student quality educational services.

(e) Degree Requirements. The specified institutional requirements for the degree(s) shall be evaluated against established standards for similar degrees in accredited institutions. The student is to be assured that the degree so approved shall not deviate substantially from all other such degrees as a mark of learning, although the processes in a particular institution may deviate markedly from those occurring in other institutional settings.

The procedures for review utilized by the Department are similar to those used in the accreditation review process. After the institution prepares a self-study report, the Department assembles a committee of educators from accredited and approved institutions to visit the institution and review its educational program. The committee report and staff recommendations are submitted to the Council for Private Postsecondary Educational Institutions for its review and comment. (The Council is a 15-member advisory committee to the Superintendent of Public Instruction on issues regarding private postsecondary education in California. Its members, which include seven individuals who represent private institutions, are named either by the Senate Rules Committee, the Speaker of the Assembly, or the Superintendent of Public Instruction. Three ex-officio members also serve on the Council, including the director of the California Postsecondary Education Commission or his or her designee.) Based upon the report prepared by the review team and the comments of the Council, the Superintendent can decide to approve none, some, or all of the institution's degree programs by the institution.

While similarities thus exist in the standards and procedures of State approval and non-governmental accreditation, the two processes are not equivalent. For example, accreditation standards include several criteria such as institutional integrity, governance and administration, and student services that are not included in the approval process. In addition, regional accreditation reviews the entire institution, while State approval reviews each program separately. For example, an institution that applies to have ten different degree programs approved by the Department may end up with only two determined to have met State standards. However, under current State law, the institution may continue to offer the other eight degree programs through the State authorization process, which includes no qualitative review of the institution.

This aspect of the law is particularly confusing to the public, since an institution which carries the label of State approval for its educational offerings may have only one of a full range of programs actually approved by the State. Thus of the 69 institutions currently approved to offer degrees in California, 25 have also been authorized to offer other degrees without any qualitative review by the State. Among these 69 institutions, 25 offer degrees primarily in the behavioral sciences, 12 offer degrees primarily in religion and theology, and eight offer degrees primarily in allied health. During the past four years, the Department has approved approximately 60 percent of the degree programs for which formal application has been submitted. (Appendix D contains a detailed explanation of the State approval process and standards and lists the degree programs approved by the Superintendent of Public Instruction.)

This State-approval process is substantially different from State "authorization" for the recognition of degree-granting institutions. "Authorized" institutions essentially operate in California without meeting any educational standards. They are required to demonstrate fiscal responsibility by maintaining $50,000 in net assets solely for the purpose of education and to make a public disclosure about several items including institutional objectives, the curriculum, faculty and their qualifications, physical facilities, and administrative personnel. But the authority of the State oversight agency is limited to verifying the accuracy of the disclosure statement, and the authorization to operate may be denied only if the disclosure is inaccurate.

Approximately 180 authorized institutions currently offer degrees in California. While some institutions use this status as a means to begin an operation before moving toward either State approval or non-governmental accreditation, many choose to remain as authorized institutions, thereby operating relatively free of government regulation. The California Postsecondary Education Commission has been critical of the authorization provision of the Education Code, concluding in a 1981 report that "there is reasonable evidence to conclude that the integrity of academic degrees is being threatened by the educational program offered by some of the authorized institutions" (p. 11). In a subsequent report (1983a), the Commission supported recommendations from a legislatively mandated committee to implement standards for the quality review of authorized institutions.

PART TWO

CALIFORNIA STATE GOVERNMENT AND ACCREDITATION

Historically, non-governmental accrediting associations and State agencies responsible for postsecondary education in California have maintained a positive and constructive relationship. This relationship has been based on a mutual understanding that the licensure of institutions by the State and the accreditation of institutions by non-governmental associations serve two very separate but complementary purposes.

- Licensure is a governmental regulatory activity by which the State grants institutions the authority to operate and award degrees and diplomas, and by which it determines that institutions have met minimum acceptable standards of educational quality and consumer protection.

- Accreditation is the process of ongoing peer and professional review of institutional operations that institutions may utilize as a means of improving their effectiveness and quality.

When educational accrediting associations initially developed in America, they were clearly voluntary, private associations. This situation has substantially changed, however, as a result of both public and governmental reliance on the judgments of these agencies, with accreditation now having assumed many public responsibilities. For example, in California the State has increasingly turned to accrediting associations for specific assistance in the following seven areas:

- assuring and increasing the quality of educational programs offered by public, independent, and private postsecondary institutions in California;

- monitoring independent and private institutions to assure their compliance with minimum standards for consumer protection and educational quality;

- monitoring institutional refund policies to assure consumer protection;

- identifying institutions and programs which are worthy of participating in State-funded student assistance programs;

- identifying institutions which offer professional training programs of sufficient quality that they can be relied on in the licensure of practitioners;

- identifying teacher education programs offered in California which are considered to be of sufficient quality to merit review by the State Commission on Teacher Credentialing; and

- monitoring the operations of out-of-state institutions offering educational programs in California, to assure that these programs comply with minimum standards within the State for educational quality.

But at the same time, State reliance on accreditation has led to some confusion between the roles of accreditation and State approval in the areas of consumer protection, institutional eligibility for participation in financial aid programs, and the licensure of professional practitioners. Independent and private postsecondary institutions are now placed in the paradoxical situation whereby they can comply with the highest available level of quality review by the State agency responsible for their oversight -- the Office of Private Postsecondary Education in the Department of Education -- but still not be eligible to participate in State-funded financial assistance programs, or enroll students who, upon graduation, are eligible to take State tests for licensure in various occupations.

The California Postsecondary Education Commission believes that much of the State's reliance on accreditation deserves endorsement and continuation rather than change. At the same time, it believes that the State should maintain a strong, rigorous process for the qualitative review of educational institutions as part of its constitutional responsibilities for the chartering and licensure of postsecondary institutions, and that change is needed in the existing process to achieve this goal. As a result, in the following pages the Commission offers conclusions and recommendations not only about the State's dependence on accreditation but also on its current policies and procedures for State approval.

ASSURING AND INCREASING EDUCATIONAL QUALITY

California relies on accreditation as an indicator of excellence in education. Accrediting standards are periodically reviewed and revised through a lengthy process of discussion among educators in order to identify the issues and practices that they feel underlie educational quality and institutional integrity. The accreditation process of the Western Association of Schools and Colleges alone, for example, annually involves approximately 500 educators from various institutions within California and selected western states visiting other educational institutions and talking with representatives of those institutions about methods to improve their educational program.

In addition, accrediting associations have a series of alternative actions available to them in helping stimulate accredited institutions to make changes necessary to maintain association standards, including the requirement of interim reports from or visits to institutions. Thus during the past ten years, the Senior Commission of WASC has issued 40 negative actions -- either warning, probation, or show cause orders -- with some of these negative sanctions applied more than once to the same institution. In two instances, accreditation was terminated but reinstated after the review process. During the same time, the Community College Commission has issued nine negative actions and has terminated the accreditation of four institutions. Thus the major accrediting association operating in California not only has a process in place to work with institutions to maintain educational standards but utilizes sanctions when they are needed.

Even though major independent and public institutions probably rightly assume that WASC will neither terminate their accreditation nor use major sanctions of warning, probation, or show-cause orders against them if it identifies weaknesses of quality, for them the accrediting process provides a means for institutional self-study and peer consultation to improve their educational program.

Another indicator of the role of accrediting associations in assuring quality is the number of formal complaints filed against accredited and nonaccredited institutions with the State oversight agency -- the Office of Private Postsecondary Education in the State Department of Education. As Table 4 shows, in the past three years 46 complaints were filed against institutions accredited by WASC, of which 24 (52%) were dismissed as invalid, four (9%) were corrected by the school, and 15 (33%) were referred to WASC staff for resolution. [Information is not available about the status of the remaining three complaints (8%).] During the same period, 417 complaints were filed against institutions accredited by national accrediting bodies (NATTS, AICS, and NHSC), with 176 of them (42%) dismissed as invalid, 91 resolved by the schools' corrective actions or by mutual compromise (22%), 45 referred to the accrediting agencies for resolution (11%), and seven were referred back to the complainant for personal civil action (2%). Finally, a total of 936 complaints were filed against non-accredited institutions. These data indicate that although accredited institutions enroll more students annually in California than non-accredited institutions, considerably more complaints (approximately 67 percent in the past three years) are filed against non-accredited than accredited institutions.

The California Postsecondary Education Commission thus concludes that the State should continue to consider accreditation as a major method to monitor and promote educational quality. At the same time, the State should not rely exclusively on accreditation for this purpose. Among the State's public colleges and universities, campus and systemwide offices have an important role to play in monitoring and promoting quality, and their responsibilities should not be delegated to accrediting associations. The Chancellor's Office of the California Community Colleges is currently working on a joint project with the Accrediting Commission for Community and Junior Colleges to define more explicitly their mutual responsibilities for monitoring

TABLE 4 Total Written Complaint Allegations Filed with the State Oversight Agency Against Accredited and Non-Accredited Institutions in California, 1980-81 - 1982-83

	Institutions Accredited by Institutional Accrediting Agencies				Institutions Accredited by Other Agencies	Non-Accredited Institutions	Total
	WASC	NATTS	AICS	NHSC			
1980-81	8	31	24	67	3	371	504
1981-82	27	66	69	68	8	344	582
1982-83	11	38	28	*	26	221	324
Total	46	135	121	135	37	936	1,410

*Included in the total for "other accrediting agencies."

Source: Office of Private Postsecondary Education.

educational quality. Similar public discussions should be initiated by the systemwide administrations of the State University and the University of California with the Senior Commission of WASC. But neither the Board of Governors of the California Community Colleges nor the governing boards and administrative officers of the University and State University should delegate to accrediting commissions their own responsibilities of assessment and improvement. The Commission therefore recommends:

> RECOMMENDATION 1. Because non-governmental accreditation serves important functions that should be protected and preserved, accreditation should remain a non-governmental activity, and the State should not initiate activities designed to replace or inhibit its role in promoting educational quality.

In addition, the State should maintain a sufficiently thorough quality review and approval process for all independent and private institutions, so that (1) the public in general as well as other State agencies can rely upon this process in identifying institutions with worthwhile educational programs, (2) institutions can have the option to join or not join non-governmental associations, and (3) accrediting associations can continue their important activities without the fear of intervention by various political and economic interests within the State.

The State Department of Education, in carrying out its approval responsibilities, has taken a major step in this direction by using some of the standards and practices of accredited institutions as guidelines for the review of non-accredited institutions. Moreover, it includes educators from accredited institutions in its visiting committees at most institutions. A major weakness in this process, however, is that an institution may operate and advertise itself as approved when only one of several programs have been approved as meeting State standards of quality. Many of the schools which operate in this category are attempting to be creative and innovative in educational delivery systems, in range of programs offered, and in methods of assessing learning. These institutions therefore need time to start programs in order to determine whether or not they are going to be successful. At the same time, the public is entitled to protection from an institution that continually advertises itself as "State approved" but that offers only a few approved degree programs among its several offerings.

The Commission believes that the maintenance of a strong State review process neither lessens the critical importance of accreditation nor moves the State into the role of an accrediting agency or implies that accreditation and State approval are equivalent. In order to assure and increase educational quality in California postsecondary education, the Commission therefore recommends:

> RECOMMENDATION 2. California should continue to utilize the two separate processes of non-governmental accreditation and State approval for independent and private institutions as they perform different yet complementary functions. Efforts should be made to strengthen both processes wherever possible.

RECOMMENDATION 3. *The State-approval process for degree-granting institutions should continue to be programmatic approval, but it should be revised to stipulate that an institution cannot advertise itself as having State approval status until all of its degree programs have been qualitatively reviewed and approved by the State's oversight agency*.

RECOMMENDATION 4. *To provide an opportunity for an institution with institution-wide programmatic approval to add a new program on a tentative basis, after operating with approval status for at least two years, it should be eligible to offer a maximum of one unapproved program for a period of no longer than three years. After that period, the program should be expected to achieve State approval or be eliminated*.

MONITORING INDEPENDENT AND PRIVATE INSTITUTIONS TO ASSURE THEIR COMPLIANCE WITH MINIMUM STANDARDS

Independent and private degree and non-degree-granting institutions are eligible to operate in California as a result either of accreditation by an accrediting association recognized by the U.S. Secretary of Education or of approval or authorization by the Superintendent of Public Instruction or (for selected vocational schools) by the Department of Consumer Affairs. Institutions that operate in California on the basis of their accredited status are not subject to State oversight of their academic or vocational programs, and they are assumed to operate in compliance with the minimum consumer protection provisions required of non-accredited institutions.

This exemption from State oversight for accredited institutions creates an anomaly in public policy. While accrediting associations require that an institution be approved by the State before it can be accredited, California policy provides that after an institution is accredited, it is thereby automatically licensed, and only in situations when there is "substantial evidence of violation" by the institution of the standards of the responsible accrediting agency can the State approval agency make further investigation. In those situations when its investigation leads to the conclusion that the institution is violating these accrediting standards, the State agency has the option of publicizing the results of the investigation, requesting that the institution improve its operations, or submitting the evidence to the Attorney General for possible court action. However, according to an opinion of the Attorney General, it has "no authority to deny, suspend, or revoke, for cause, an 'authorization to operate' with respect to a private postsecondary educational institution holding an accreditation . . ." (No. 79-415, October 10, 1979). The ability of the State to remove the license of an accredited institution which is not in compliance with State law is restricted by current law, as that authority has been delegated to the accrediting associations.

Since the enactment of the California legislation in 1977, the Office of Private Postsecondary Education has sought unsuccessfully to remove the license of an accredited institution that it considered to be in non-compliance with the State's minimum standards. This inability of the State to remove the license of an institution that is not in compliance with State law differs significantly from the situation in other states. A Commission staff review of such other states as Florida, Illinois, Massachusetts, New Jersey, New York, Ohio, and Pennsylvania demonstrates that California is unique among them in giving up its statutory responsibility for the continued licensure of private institutions to a non-governmental agency. Similarly, its practice differs from the recommendation of the Education Commission of the States in its 1973 Model State Legislation that although states should use accreditation as possible evidence of compliance with statutory minimum standards, a state should not abrogate "its statutory responsibility through substitution of accreditation for independent review and action" (p. 12). Therefore, the Commission recommends:

> RECOMMENDATION 5. The State should continue to rely on accrediting associations to exercise primary responsibility for the oversight of accredited independent and private institutions. Nevertheless, when available evidence suggests a reasonable probability of non-compliance by an accredited institution with State standards for approval, the State oversight agency should work with the accrediting association to correct the situation. The State agency should provide the accrediting association with all available evidence and request the association to provide a written response to the specific issues raised by the State. As a last resort, however, if the issues still remain unresolved after the accrediting association has had a reasonable period of time to work with the institution, the State should have the authority, after exhausting all administrative procedures necessary to insure the involved institution due process of law, to rescind the license of an accredited institution which is not in compliance with State standards.

MONITORING INSTITUTIONAL REFUND POLICIES TO ASSURE CONSUMER PROTECTION

State law provides a set of minimum standards for consumer protection for students and prospective students of private postsecondary institutions. Accredited institutions, however, are exempted from compliance with these provisions, apparently on the assumption that the consumer protection standards of the accrediting associations are higher than those maintained by the State for non-accredited institutions.

This assumption is generally accurate in all areas except for tuition refunds for a student withdrawing from an institution prior to completion of the course of study. Non-accredited institutions are required by the State to provide tuition refunds until a student has completed at least 50 percent of the course of study. Both the National Association of Trade and Technical Schools and the Association of Independent Colleges and Schools require, as a minimum, that students be entitled to tuition refunds until they have completed over 50 percent of the course. However, public and independent degree-granting institutions accredited by other agencies vary considerably from the minimum standard required for non-accredited degree-granting institutions.

The Senior Commission of the Western Association of Schools and Colleges requires that institutions have "a well-publicized and uniformly administered policy regarding fee refunds, consistent with customary standards" (1982, p. 50). However, in practice, most refund policies of WASC-accredited institutions are less oriented toward the needs of the student than are non-accredited, degree-granting schools, and the policies vary considerably from the requirements maintained by national accrediting associations for their member institutions.

The need for some uniformity in refund policy among both public and independent institutions has been recognized by the American Council on Education and other national associations as well as by the California Postsecondary Education Commission. For example, in the Council's "Policy Guidelines for Refund of Student Charges," which were drafted by the National Association of College and University Business Officers, the Council has recommended that "the institution should refund at least 25 percent of the tuition charge if written notification of withdrawal is made during the first 25 percent of the academic period." The Council also concludes that it is reasonable to "refund tuition charges on a sliding scale if a student withdraws from his or her program prior to the end of the first 25 percent of the academic period unless state law imposes a more restrictive refund policy" (American Council on Education, August 1979, p. 2). And in a previous report on State regulation of private postsecondary institutions, the Postsecondary Education Commission concluded that "private and public degree-granting schools vary considerably in their refund provisions; most are less oriented toward the needs of the student than are accredited nondegree-granting private schools . . . . There is a need for greater uniformity in minimum refund provisions so that students receive equal treatment in all postsecondary institutions" (1976, p. 94). The Commission then recommended that policies should be adopted so that all accredited and non-accredited institutions provide partial tuition refund until the student has completed 51 percent of the academic program.

With one exception, students who attend all accredited and non-accredited degree-granting institutions in California are entitled to some refund of their tuition charges until they have completed 50 percent of the program. The only exception is students at those institutions accredited by WASC which have not voluntarily adopted such a policy, since WASC does not require any specific policy from its member institutions. In contrast, the other institutional accrediting associations operating in California have chosen to adopt policies which are even more restrictive than that required by the State. Because WASC-member institutions, differ greatly, ranging from large public universities to small single-purpose private institutions, a specific uniform refund policy is probably not desirable. Nevertheless, WASC guidelines for its member institutions could be more helpful in stimulating the review of existing policies to assure that diversity among the institutions does not jeopardize the legitimate rights of students.

Therefore, in order to assure more equitable protection for students attending WASC-accredited institutions, the Commission recommends:

RECOMMENDATION 6. The Senior and Community College Commissions of the Western Association of Schools and Colleges should review their current guidelines for tuition refund as well as the "Policy Guidelines for Refund of Student Charges" drafted by the National Association of College and University Business Officers, to determine if more specific guidelines on this issue should be implemented by the two commissions.

IDENTIFYING INSTITUTIONS ELIGIBLE TO PARTICIPATE IN STATE-FUNDED STUDENT ASSISTANCE PROGRAMS

California State policy of relying on accreditation for determining institutional eligibility for participation in State-funded student assistance programs has resulted in the anomaly that some institutions that meet the highest existing State standards for licensure to award degrees or diplomas cannot benefit from these programs because they have not applied for or have been denied recognition by non-governmental accrediting associations.

At the undergraduate level, State law currently restricts eligibility for State aid programs to those institutions that participate in at least two of the federal government's three campus-based student aid programs and whose students participate in the federal Basic Educational Opportunity Grant Program. The Legislature adopted this policy in order to maximize financial aid resources for students by requiring that institutions participate in the full range of federal assistance programs, with State student aid funds used to supplement, rather than supplant, federal funds. One implication of this policy, however, is that the State has thereby adopted the federal eligibility requirement that institutions be either accredited or candidates for accreditation by a nationally recognized accrediting agency or have their credits accepted on transfer by at least three accredited institutions.

At the graduate level, State law specifically limits institutional eligibility to institutions accredited by WASC, the California Committee of Bar Examiners, or the American Osteopathic Association. In practice, the Student Aid Commission has also included institutions which are candidates for WASC accreditation. Yet, as at the undergraduate level, institutions approved only by the Superintendent of Public Instruction are ineligible.

While the State should continue to utilize accreditation as one indicator of institutional quality, accreditation should not be mandatory for participation in State-funded aid programs. Instead, State-approved institutions with all of their programs qualitatively reviewed and approved by the Superintendent of Public Instruction should be eligible for consideration for participation in State aid programs. The current State policy of reliance on accreditation to determine institutional eligibility for financial assistance programs does not relate to the State's financial aid goals to maximize aid resources for students, and it may exclude students who attend institutions which have been qualitatively reviewed by the State. Accordingly, the Commission recommends:

RECOMMENDATION 7. The State criteria utilized to determine institutional eligibility for participation in State-funded undergraduate and graduate student assistance programs should be examined by the Student Aid Commission during the next year. This examination should consider the impact of modifying the criteria regarding institutional eligibility so that institutions qualitatively reviewed and approved by non-governmental accrediting associations or having institution-wide programmatic approval from the State oversight agency (as provided in Recommendation 3 above) are eligible for participation in the State programs if they meet all other State requirements. In preparing this review, the Student Aid Commission should include an analysis of the total cost for any changes in institutional eligibility for participation in State financial aid programs, with this information submitted to the Legislature as appropriate.

IDENTIFYING INSTITUTIONS AND PROGRAMS FOR LICENSING PROFESSIONAL PRACTITIONERS

State policy utilizes non-governmental accreditation as one criterion for licensing practitioners in the ten professions and specialized occupations identified in Table 5 on page 56. In seven of these ten fields -- dentistry, medicine, physical therapy, podiatry, optometry, pharmacy, and chiropractic -- applicants must complete their education in programs accredited by the appropriate specialized agency. In the other three -- clinical social work, educational psychology, and geology -- graduation from an institution with regional accreditation is required. In 11 others (Table 6, pages 57-58), applicants must graduate from either an accredited institution or an institution whose programs have been approved by the Superintendent of Public Instruction.

As the information on Tables 5 and 6 indicate, State policy in the licensure of professional practitioners has generally been to rely upon specialized accrediting associations in the medical and health professions and either regional accreditation or State approval in other occupations. This State reliance on accrediting associations is generally both appropriate and reasonable. In the medical and healing arts professions, it is desirable to utilize the expertise of the specialized accrediting associations as a means of determining that practitioners have met some predetermined standards prior to initiating their practice. It is also appropriate to utilize regional accreditation as an alternative to State approval as a means of identifying institutions with adequate educational programs.

The only exceptions to this policy are two occupations -- educational psychologist and geologist -- where the applicable licensing board requires graduation from an institution with regional accreditation. This requirement that an individual graduate from a regionally accredited institution before they can sit for the licensure exam is questionable. Since regional accreditation applies to the entire institution and not to specific programs, it does not provide explicit assurance that particular programs will have met the specific educational standards of that profession. Therefore the Commission recommends:

TABLE 5 *Occupations That Require Education at an Accredited Institution as a Requisite for Licensure*

Board	Occupation	Licensure Requirement
Behavioral Science Examiners	1. Clinical Social Work	Requires degree from a program accredited by the Council on Social Work Education or an institution with regional accreditation
	2. Educational Psychologist	Requires degree from an institution with regional accreditation
Dental Examiners of California	3. Dentist	Requires degree from an institution accredited by the American Dental Association
Medical Quality Assurance	4. Physician and Surgeon	Requires degree from an institution accredited by the Liaison Committee on Medical Education
	5. Podiatrist	Requires degree from an institution accredited by the American Podiatry Association
	6. Physical Therapist	Requires degree from an institution accredited by the American Physical Therapy Association
Optometry	7. Optometrist	Requires degree from an institution accredited by the American Optometric Association
Pharmacy	8. Pharmacist	Requires degree from an institution accredited by the American Council on Pharmaceutical Education
Geologists-Geophysicists	9. Geologist and Geophysicist	Requires graduation and 30 units in geological sciences from an institution with regional accreditation
Chiropractic Examiners	10. Chiropractor	Requires two years pre-chiropractic education from an institution with regional accredita- and graduation from a chiropractic college recognized as a candidate for accreditation or accredited by the Council on Chiropractic Education

Source: California Postsecondary Education Commission staff analysis.

TABLE 6 Occupations That Utilize Accreditation as One of Various Alternatives to Meet the Educational Requirements for Licensure

Board	Occupation	Licensure Requirement
Accountancy	1. Accountant	Requires graduation from either an accredited or an approved institution, with a specified number of semester hours required in the study of accounting for graduates of the latter institutions.
Architectural Examiners	2. Architect	Requires five years of education and/or experience and more qualifying credits are given if the degree is from an accredited rather than a non-accredited institution
Bar Examiners of the State of California	3. Attorney	Requires graduation from an institution accredited by the California Committee of Bar Examiners or the study of law for not less than four years, and not less than 270 hours per year in a law school authorized to confer professional degrees or, four years of study of law by correspondence at a school recognized by the Board or, four years of experience in California office of a member of the bar or chambers of a judge or, four years in a combination of the above.
Behavioral Science Examiners	4. Marriage, Family, and Child Counselor	Requires degree from an institution with regional accreditation or State approval
Forestry	5. Forester	College or university degrees in forestry may be substituted for some of the required qualifying experience. A degree in forestry will be accepted from any college or university that qualifies for transfer credit in the accredited forestry programs of either the University of California, Berkeley, or Humboldt State University.

(continued)

TABLE 6 Continued

Board	Occupation	Licensure Requirement
Medical Quality Assurance	6. Registered Dispensing Optician	Requires graduation from a program offered by a school with regional accreditation or State approval
	7. Speech Pathologist/Audiologist	Requires MA in the field from institution accredited by the American Speech and Hearing Association, or from an institution with regional accreditation with a degree program in the field with at least one full-time staff in the area, or a non-accredited school approved by the Speech Pathology and Audiology Examining Board
	8. Psychologist	Requires doctorate from an institution with regional accreditation or State approval
	9. Research Psychologist	Requires doctorate from an accredited or State approved institution
Osteopathic Examiners	10. Osteopath	Requires graduation from an institution accredited either by the American Osteopathic Association or the Board of Osteopathic Examiners
Professional Engineers	11. Engineer	Requires graduation from an institution accredited by the Accrediting Board for Engineering and Technology and two years of experience, or graduation from a nonaccredited program and four years of experience
Veterinary Medicine	12. Veterinarian	Requires graduation from a school accredited by the American Veterinary Medical Association or, for graduates of non-accredited schools, one-year of clinical experience approved by the Board

Source: California Postsecondary Education Commission staff analysis.

RECOMMENDATION 8. The expertise of specialized accrediting associations should continue to be used in the health professions as a means of screening out potential practitioners who have not met specific predetermined standards. In all other professions, graduation from an institution with regional accreditation or institution-wide programmatic approval by the State (as proposed in Recommendation 3) should continue to be required as a means of identifying individuals who have potentially met the requirements for licensure.

RECOMMENDATION 9. The Behavioral Science Examiners Board and the Geologist/Geophysicists Board should review their current practices that require graduation from a regionally accredited institution as a requirement for individuals to sit for licensure examinations in educational psychology and geology, respectively. Consideration should be given to the utilization of institution-wide programmatic approval by the State as an additional means to identify institutions with adequate educational programs.

The intended effect of Recommendation 9 is to promote a consistent policy among the State's licensure boards in their reliance on accrediting associations, while also allowing students from institutions with State approved programs to present themselves for the same type of evaluation made of graduates from regionally accredited institutions. Neither Recommendation 8 nor 9, however, assume that State approval and non-governmental accreditation processes are equivalent.

IDENTIFYING QUALITY TEACHER EDUCATION PROGRAMS

California's Commission on Teacher Credentialing (formerly the Commission for Teacher Preparation and Licensing) has the dual responsibility of approving postsecondary institutions whose teacher education program meets its standards and then issuing credentials to persons who successfully complete programs at these institutions. Current State law implies that accreditation should be used as a criterion to identify institutions which merit review by the Commission. To illustrate, Section 44227 of the Education Code states that "the Commission may approve any institution of higher education whose teacher education program meets the standards prescribed by the Commission" and Section 44226 indicates that "it is the intention of the Legislature that the Commission consider for approval for credential purposes accredited baccalaureate degree granting institutions . . . ." State law does not prescribe that the Commission approve only those programs operated by accredited institutions, yet the practice of the Commission is to require regional accreditation. In reality, therefore, institutions which have been qualitatively reviewed and approved only by the State Superintendent of Public Instruction or by national accrediting associations such as the American Association of Bible Colleges are not eligible for Commission approval.

By eliminating all institutions without regional accreditation from consideration as potential quality teacher education programs, current practice by the Commission on Teacher Credentialing perpetuates the contradiction that private postsecondary institutions with programs which are qualitatively reviewed and approved by one State agency (the Superinendent of Public Instruction) are not accepted by a different State agency (the Commission on Teacher Credentialing) as worthy of review for possible approval. In addition, the current Commission practice excludes institutions with national accreditation, despite the directive in the law that it shall consider "accredited baccalaureate degree granting institutions."

Arguments have been expressed against changing this current policy of the Commission on Teacher Credentialing. Considerable public disquiet exists concerning the quality of teacher preparation programs and the inclusion of more teacher education programs for review by the Commission might allow weaker programs to be established throughout the State. It is also argued that preparation for teaching requires a total, coordinated program from the entire institution and not simply a narrow specialized major. Consequently, a total institutional review of academic offerings is necessary, as provided through regional accreditation.

While the Postsecondary Education Commission sees merit in these arguments, it does not feel that regional accreditation should be the sole determinant of institutional eligibility for review by the Commission on Teacher Credentialing, as institutional accreditation by national associations and institutionwide programmatic approval by the State Department of Education also involve qualitative judgments by appropriate agencies.

ASSURING OVERSIGHT OF OUT-OF-STATE OPERATIONS

During the mid-1970s, colleges and universities began the extensive development of off-campus programs, extending their operations across both state boundaries and regional accrediting association boundaries. Some of these educational programs, however, were not offered at an acceptable level of quality, as COPA indicated in a statement in October 1976 (p. 1):

> there is increasing evidence that at least a handful of colleges and universities apparently have established off-campus degree programs that are not equivalent academically to similar programs on campus, and further that they have allowed these off-campus programs to operate without adequate supervision from the sponsoring institution.

The problems identified by COPA included:

- institutions sponsoring programs off campus for which they had no counterparts on campus;

- institutions offering off-campus programs that required little or no involvement or oversight by on-campus faculty, and in some cases, contracting out responsibility for the off-campus units to a non-academic authority;

- institutions formalizing a differential standard of quality for credits earned off campus compared with those earned on campus; and

- off-campus offerings ranging from relatively large permanent educational units to short-term programs consisting of one course, one faculty member hired locally, and a handful of students.

California policy regarding the oversight of operations by out-of-state institutions has remained consistent during the past two decades. Non-accredited institutions from outside California who sought to offer programs in the State have been required to meet the standards maintained by the State oversight agency for all non-accredited institutions. The responsibility for the oversight of out-of-state accredited institutions has been delegated to the appropriate home accrediting agency. However, during the past ten years, the regional accrediting commissions have adopted dissimilar approaches in responding to this issue, and consequently the public interests have not always been well-served in this area.

The regional accrediting associations, working through COPA, have made several generally unsuccessful efforts at agreement in response to this problem. The first was based on a "Memorandum of Agreement on Accreditation and Off-Campus Educational Activities" adopted by COPA in August 1977 that provided policy guidelines for the regional associations, including the provisions that institutions file a report with them at least 90 days prior to opening any new off-campus sites and that representatives of the accrediting commission in the new region "be invited to participate in any on-site evaluation conducted by the accrediting commission of the region in which the parent institution is located" (COPA, 1977, p. 2). A major weakness of the memorandum was the absence of a requirement that all off-campus sites be reviewed, and in practice, the regional associations adopted different strategies in implementing the memorandum.

In 1981, in response to indications that the oversight of out-of-region operations was still inadequate, a COPA sub-assembly of regional accrediting associations approved a statement of joint visitation procedures when the home regional association visits a program in another region. This agreement, which was actually a statement of current practice, provided that in the review of out-of-region operations, the home regional association standards should be used and the accrediting decision would be made by the home regional association in reference to the entire institution. In an effort to develop new policy directions, a proposal was adopted in principle "for each regional association to be responsible for all education programs operating in its region, including those programs of institutions from outside the region, with reports of evaluation going to the home regional for institutional action." This proposal was discussed further at subsequent meetings of COPA, but in Spring 1982, it was dropped because of a lack of consensus among the regional associations.

The third and most recent effort was the approval in principle in October 1982 by the directors of all six regional associations that (1) the home regional association would retain accrediting authority for all branches of an institution, wherever located; (2) while the standards of the home region would be used in making a final accrediting decision, the standards of both associations would be used in conducting the visit; and (3) the accreditation teams would include evaluations from both regions. While this agreement was modified to some extent in April 1983, it remains the current policy recommended by COPA.

Considerable variation exists in the accreditation standards utilized by the six regional accrediting associations. The Western and Southern Associations, particularly the former, have the most detailed and specific set of standards. At the other end of the spectrum, the North Central Association does not have standards for accreditation but rather utilizes four "intentionally general" evaluative criteria to make judgments about institutions. The accreditation standards of the other three associations are presented in more general terms than those of the Western and Southern Associations. (A summary of the purposes and standards of accreditation utilized by the six regional associations is presented on Table 7 on pages 64-65.) This variation in the accrediting standards is one reason why the various cooperative agreements among the six regional accrediting associations has not produced an adequate level of oversight of accredited out-of-state institutions operating in California.

The California Legislature took action in 1981, by requiring all out-of-state institutions desiring to operate in California as regionally accredited institutions to have their California-based operations accredited by WASC rather than any of the other five regional accrediting associations. Passed by the Legislature in 1981, this requirement became effective on July 1, 1983, thereby allowing institutions two years to move into compliance.

During the six months in which the Senior Commission of WASC has been carrying out this new responsibility for accrediting out-of-state operations in California, it has found that of the six institutions which applied for WASC accreditation, only one had ever been visited by its home accrediting association. The other five had been operating as accredited institutions without any on-site review by their accrediting association. Of the 32 accredited out-of-state institutions operating in California when the statute was adopted, 11 withdrew from California, five gained accreditation by national institutional accrediting associations, ten have applied for State authorization to offer degrees, five were granted accreditation by WASC for their California activities, and one was denied WASC accreditation.

The efforts by WASC to cooperate with the legislative request for an expanded role for WASC in the accreditation of out-of-state institutions has been met with considerable resistance from the other regional and programmatic accrediting associations. The Recognition Committee of COPA has indicated that, as a result of these new activities, WASC might be "engaged in accrediting activities which exceed the scope of its recognition," and has requested that WASC officials explain if there has been a change of scope, and, if so, to file an application for change of scope to include programmatic accreditation. In addition, the new WASC actions are viewed as a challenge to the existing inter-regional cooperation among the regional associations. To date, the Recognition Committee has not made any finding on this issue, and the Senior Commission has argued that no change in scope is involved. It is expected that over the next year, this issue will receive considerable discussion by various accrediting associations.

Based on the above discussion, the Commission offers the following conclusions:

1. Existing inter-regional cooperative agreements among the six regional accrediting associations do not provide necessary oversight of accredited out-of-state institutions operating in California because the accreditation standards vary among the six associations, with the Western Association having the most detailed and specific. Moreover, while the regional associations have tried to work together wherever possible, they have not always adopted a common strategy to implement the cooperative agreements.

2. The change provided in the legislation calling for the California-based operations of out-of-state institutions to be accredited by WASC rather than the other regional associations was necessary in order to accomplish State oversight of these institutions. Thus far, the process developed by WASC to implement this policy seems to be working effectively.

3. It should be anticipated that WASC officials will need to discuss this process with representatives of COPA and other regional and specialized accrediting associations, and therefore the possibility exists that WASC's current accrediting procedures for out-of-state institutions may be altered. However, it is essential that two key principles of these procedures be retained. Therefore the Commission recommends:

    RECOMMENDATION 10. Two important principles of the current WASC procedures for the review of California-based operations of out-of-state accredited institutions should be continued: (1) the utilization of WASC standards as the basis for accreditation, with (2) the final accreditation decision made by the Senior Commission of WASC. These institutions should also continue to have the option for either authorization or approval by the State oversight agency as an alternative for WASC accreditation.

ENCOURAGING AGENCY OPERATION IN THE PUBLIC INTEREST

As a result of the close relationship that has evolved between California State government and non-governmental accrediting associations, these associations have developed legal responsibilities to function in the public interest, not to act contrary to public policy, and to have fair procedures reasonably related to the purposes of accreditation. The continued success of this relationship requires both careful actions by the State not to place overwhelming demands on the accrediting associations as well as continued responsiveness by the accrediting associations to act in the public interest. Among their responsibilities as representatives of the public interest, according to William Kaplan (1982), are these attributes:

TABLE 7 Summary of the Purposes and Standards of Accreditation

Criterion	Middle States Association	New England Association (Institutes of Higher Education)	North Central Association
1. Purposes of Accreditation	To attest that an institution is guided by well-defined and appropriate objectives, that it is accomplishing them substantially, and that it is so organised, staffed, and supported that it can be expected to continue to do so.	To signify that an institution has been carefully evaluated and has been found to follow basic educational policies, practices, and standards comparable to those of other member institutions of its type.	To provide public certification that an institution is of acceptable quality.
2. Standards of Accreditation	Standards are presented in 13 areas: purposes and objectives; program; outcomes; admissions and student services; faculty; organization and administration; board of trustees; resources; library/learning center; plant and equipment; financing and accounting; innovation and experimentation; and catalogs and other publications. These standards are relatively general.	Standards are presented in 12 areas: objectives; evaluation and planning; organization and governance; programs and instruction; special activities; faculty; student services; library and learning resources; physical resources; financial resources; ethical standards; and publications and advertising. These standards are relatively general.	Standards for accreditation are not provided. Instead, four intentionally general evaluation criteria are used: (1) the institution has clear and publicly stated purposes, consistent with its mission and appropriate to a postsecondary institution; (2) the institution has adequate human, financial, and physical resources to accomplish its purposes; (3) it is accomplishing its purposes; and (4) it can continue to accomplish its purposes.
3. Specific Standards on Faculty Qualifications and Competency	Faculty must consist of competent, professionally prepared, interested individuals, each fully ready to accept responsibility for maintaining the highest level of professional competence.	The preparation and qualifications of all members of the instructional staff should be suited to the field and level of their assignments. Those in the conventional academic fields should hold advanced degrees or present evidence of scholarship or creative achievement appropriate to their positions.	No standards in this area.
4. Specific Standards on Institutional Governance	The overall control and support of an institution's plans and operation are the responsibility of the board of trustees. The board is responsible for seeing that the institution is what it is intended to be, that it fulfills the purposes for which it was founded, and ensures its continuance. The board is entrusted with the institution's property and assets, as well as for upholding the institution's reason for being.	The governing board is the legally constituted body which holds the property and assets of the institution in trust. It is responsible for sustaining the institution and its objectives; it should exercise ultimate and general control over its affairs.... The faculty should have a major role in developing and conducting the academic program and in maintaining the standards and conditions which pertain directly to instruction and research.	No standards in this area.
5. Provisions for Nontraditional Institutions	All traditional and nontraditional institutions are expected to demonstrate they comply with the "characteristics of excellence in higher education" which are presented as the qualities and characteristics that distinguish superior educational institutions.	Nontraditional institutions are expected to demonstrate that they comply with the intent of the standards. "Institutions whose policies, practices, or resources differ significantly from those described in the Standards or which make extensive use of nontraditional formats, modes, or techniques of education, must present evidence that these are appropriate to higher education, and are effective (through alternative) means for achieving the intent of the standards."	Each institution is to be judged on the basis of its own purposes, and the evaluation criteria are extremely generalized so that they are applicable to all types of institutions.
6. Year When Standards Were Adopted	1978	1979	1981

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Utilized by the Six Regional Accrediting Associations

Northwest Association	Southern Association (Colleges Commission)	Western Association (Senior Commission)
To attest that an institution's own goals are soundly conceived, its educational programs have been intelligently devised, its purposes are being accomplished, and the institution is so organized, staffed, and supported that it should continue to merit such confidence.	To attest that an institution has clear educational goals and objectives, maintains a system of educational delivery that embraces and affords the necessary learning, and employs instruments for the assessment of the attainments of students that would be acceptable if independently examined by experts in the field.	To assure that an institution has clearly defined educational objectives appropriate to higher education and consistent with Commission standards, that it appears in fact to be accomplishing them substantially, and can be expected to continue to achieve these objectives.
Eleven standards are utilized: institutional objectives and statement of purposes; finance; physical plant, materials, and equipment; library and learning resources; educational program; continuing education and special instructional activities; instructional staff; administration; students; research; and graduate program. The standards are relatively general.	Eleven standards of accreditation are utilized: institutional objectives and statement of purposes; finance; physical plant, materials, and equipment; library and learning resources; educational program; continuing education and special instructional activities; instructional staff; administration; students; research; and graduate program. The standards are presented in considerable detail.	Nine standards of accreditation are utilized: institutional integrity; purposes; governance and administration; educational programs; faculty and staff; library, computer, and other learning resources; student services and activities; physical resources; and financial resources. These standards are presented in considerable detail, with specific requirements included.
The preparation and experience of the faculty are significant factors in determining the quality of an institution and should be such as to further the purposes of the institution.	All teaching faculty members must have special competence in the fields in which they teach. This special competence is attested to by advanced study, culminating in appropriate advanced degrees, or by extensive work experience in the teaching fields or in a professional practice which is demonstrably of highest quality.	Members of the faculty are qualified by training and experience to serve at the levels that the institution's purposes require. For example, doctoral candidates have research supervision from faculty who have research experience and/or appropriate field experience well beyond their own dissertations.
The governing board should have a clear idea of its general duties and responsibilities and should seek to define them in an official policy statement. A clear differentiation between the policy-making function of the board and the executive responsibilities of those who carry out these policies is essential.	The responsibilities of the governing board include establishing broad institutional policies, securing financial resources to support adequately the institution's program, and selecting the chief administrative officer. ...There should be a clear differentiation between the policy-making functions of the governing board and the responsibility of those in charge of administering these policies. The chief administrative office should be free to administer the institution within the broad policies laid down by the board.	The governing board selects a chief executive officer, approves the purposes of the institution, and concerns itself with the provision of adequate funds. The board is ultimately responsible for the quality of the institution through an organized system of institutional planning and evaluation. The role of faculty in institutional governance is both substantive and clearly defined. The role of students in institutional governance is clearly stated and publicized.
A separate set of policies and principles are presented for nontraditional institutions, based on the belief that, "at this early stage in the development of nontraditional degree programs, the principles, policies, and procedures specified for accreditation must be flexible and of an interim nature."	Nontraditional institutions are expected to meet the same standards as all other institutions. Variances with the standards are allowed on the basis of (1) credible evidence that one or more specific elements of the standards is educationally dysfunctional with reference to the unconventional characteristics of the institution or its program, and (2) credible evidence of evaluation procedures which certify the effective learning outcomes of students so as to validate the unconventional effort in terms of its acceptable educational purpose.	Nontraditional institutions are expected to meet the same standards as all other institutions. "Some institutions may find it difficult to comply precisely with the standards which are usually more closely identified with traditional practice. In such cases, demonstration of equivalency of quality or accomplishment of the objective of the standards is the responsibility of the institution."
1982	1977	1982

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- Impartial and open membership available to both traditional and non-traditional educational institutions, requiring only that they comply with specific standards of quality.

- Freedom of their representatives from any actual or apparent personal or pecuniary interest in the outcome of their decisions.

- Autonomy from political and economic interests either from within the organization or from the larger community outside of the organization so that decisions about accreditation are based solely on educational goals and standards.

- Responsiveness to changing educational methodologies, learning strategies, and educational policy and needs.

- Adequate educational and professional expertise to make informed decisions together with sufficient public representatives to protect the impartiality of their decisions.

After reviewing the structure and operation of accrediting agencies on these criteria, the Commission has concluded that improvements in two agencies will increase their effectiveness as representatives of the public interest.

Committee of Bar Examiners

The Committee of Bar Examiners plays a crucial role in the oversight of law schools in California, and because it is the only accrediting association in California created by statute and functioning clearly as a quasi-governmental agency, it is doubly imperative that its structure and operations be adequate. Its present organization and processes have two weaknesses:

- First, its members predominantly include representatives of the legal profession but no representatives of accredited law schools. It is thus the only accrediting body operating in California that does not include such representation, and it can therefore be accused of not being sufficiently sensitive to the educational role of accreditation and of representing to an unfair extent the interests of the profession.

  At the same time, however, difficulties would arise if representatives of accredited law schools were added to the Committee, as the Committee has many other functions beyond accreditation, including preparation of the California Bar Examination, supervision of the grading of these examinations, and action on all applications not decided by staff review. If representatives of accredited law schools had access to the examination process as members of the Committee, the integrity of the examination process might be suspect and conflict of interest might arise. While representatives of accredited law schools have an important and legitimate role to play in accrediting California law schools, potential conflict of interest situations should be avoided.

- Second, law schools that contend that the Committee has violated its own criteria or procedures in decisions about their denial or termination of

> accreditation have no recourse for the appeal of those decisions other than petitioning the California Supreme Court, and hearings by the Supreme Court are discretionary.
>
> In contrast, if any other accrediting association appears to violate its criteria or procedures in denying or terminating accreditation, an institution may appeal for review to COPA as well as to a Superior Court. Thus, law schools seeking or maintaining accreditation by the Committee of Bar Examiners are unique among California postsecondary institutions in not having a formal appeals process available to them.

Accordingly, the Commission recommends:

> RECOMMENDATION 11. The Committee of Bar Examiners should establish a separate committee with the responsibility for accrediting law schools, with the composition of this committee similar to that of the American Bar Association, including significant representation from accredited institutions. In addition, the Committee should develop and implement an appeals process for institutions similar to that maintained by the American Bar Association.

Accrediting Commission for Senior Colleges and Universities of the Western Association of Schools and Colleges

The Community College Commission of WASC has implemented an important reform during the past year to provide a formal process for the selection of Commissioners that guarantees the involvement of faculty, administrators, and public representatives in the selection process. This process helps to maintain the image of this accrediting association as impartial, open, and autonomous. In contrast, the Senior Commission of WASC is the only regional accrediting association in the United States which is not a membership organization. The institutions accredited by the Senior Commission have no direct voice in the selection of Commissioners. Moreover, the various constituents of accreditation -- the faculty, administrators, and public representatives -- have no formal participation in the selection process, as currently exists for the Community College Commission of WASC. By placing the authority for the selection of the Commissioners in the executive committee of the Western College Association (WCA -- an association of accredited institutions from 13 western states), the Senior Commission has adopted a process which is unique among regional associations and which can justifiably be perceived as relatively closed and tightly controlled.

During the past six months, the Senior Commission has made two changes in the process by which its members are selected. (These changes are presented in Appendix E.) For the first time, in Spring 1984, all member institutions were solicited for nominations to the Executive Committee of WCA and to the Senior Commission itself. In addition, a Western College Association Nominating Committee has been established to select members of the Senior Commission, with a faculty and a public representative in addition to the President-Elect of the WCA, the Chair of the Senior Accrediting Commission, and the WCA Executive Secretary-Treasurer. Both of these changes are steps in the right direction to make the governance of the Senior Commission a more open process.

Thus the Postsecondary Education Commission recommends:

> RECOMMENDATION 12. The Senior Commission of WASC should continue to review its current process for the selection of commissioners and examine the processes used by other regional accrediting associations to determine if there is a method of more directly involving the member institutions and the various constituencies of accreditation in the selection of commissioners.

RELATING SPECIALIZED ACCREDITATION TO INSTITUTIONS AND INSTITUTIONAL POLICIES

Pages 33-35 of this report have discussed the considerable disagreement in the education community about the overall merits of specialized accreditation. While this disagreement is shared by California educators, official policy in the postsecondary community has encouraged the expansion of specialized accreditation on the campuses.

The California State University has been strong in support of expanded programmatic accreditation among its 19 campuses. In April 1968, its Trustees adopted the following resolution emphasizing the importance of accreditation:

> WHEREAS, It is the policy of the Board of Trustees to assure that development of instructional programs is of high quality; and
>
> WHEREAS, Accreditation of certain instructional programs by national professional accrediting agencies serves to establish and maintain high academic standards; now, therefore, be it
>
> RESOLVED, By the Board of Trustees of the California State Colleges, that each State College be encouraged, in cooperation with the Office of the Chancellor, to seek accreditation of appropriate instructional programs by national professional accrediting agencies; and be it further
>
> RESOLVED, That the Office of the Chancellor ascertain and budget for each State College the anticipated annual costs involved in such accrediting procedures.

Further action was taken by the State University Systemwide office in January 1975, with the adoption of a report of the ad hoc Committee on Academic Standards -- a committee established by the Board of Trustees -- which contained the following comments and recommendations:

> The *ad hoc* Committee on Academic Standards, while applauding the increased number of accredited subject areas, wishes to encourage further efforts to earn accreditation in subject areas not now accredited by nationally recognized accrediting bodies. It is the

> Committee's opinion that evaluation of subject area programs by such external agencies provides invaluable review of qualitative aspects of curricula. Therefore, the Committee recommends that each campus President submit periodic reports to the Chancellor outlining the progress of departments or areas of study toward accreditation by approved accrediting agencies (where such agencies exist), or indicating why they have not sought or have not attained accreditation;
>
> And,
>
> the Committee recommends that the Chancellor's Office continue to issue an annual report of curricular programs available for accreditation, those accredited, and those not accredited.

Partially as a result of encouragement from the Chancellor's Office, State University campuses have expanded their involvement with specialized accrediting associations. In addition, the Chancellor's Office has adopted the policy that a department must have programmatic accreditation before a master degree program can be added to an existing undergraduate program. As a result, systemwide budgeting for specialized accreditation has increased from $169,103 in 1981-82 to $312,687 in 1984-85, with the largest amounts being expended for programmatic accreditation in business, social work, and nursing (Table 8, page 70). To provide consistency with funding of campus requests for programmatic accreditation, the Chancellor's Office had adopted the policy that funding would be provided only to those agencies recognized by COPA. In June 1981, however, the Board of Trustees revised this policy by adding the National Association of Schools of Theatre despite its lack of COPA recognition for accreditation of theatre arts programs. The Chancellor's Office neither encourages nor discourages campuses in seeking recognition of other non-COPA-approved agencies, such as the American Chemical Society and the National Association of Schools of Public Affairs and Administration. State University programs that hold accreditation from such agencies do not receive explicit budget support for accreditation expenses. Rather, the campuses or departments involved use existing resources to accommodate the added expenses.

In contrast to the State University, the University of California has not adopted a systemwide policy on whether or when a campus or program should seek specialized accreditation. These decisions are made on the campus level, based on faculty and administrative perceptions of the usefulness of such accreditation. Practices among the University campuses vary considerably, with the Berkeley campus maintaining accreditation from 12 specialized agencies and the Santa Cruz campus not having membership with any specialized accrediting associations. The nine University campuses expend approximately $140,000 annually to meet the direct costs of specialized accreditation (Tables 9 and 10, pages 71 and 72). This approximate expenditure does not include the cost of college staff time involved in the visits and the preparation of the self-study report. Since data over the past years are not available for the University of California, an assessment cannot be made of the trend of financial implications of the expanding utilization of specialized accreditation within this segment.

Data are not currently available from the California Community Colleges about the direct costs of specialized accreditation. Decisions about the application for specialized accreditation are made at the college level, with the primary determinant related to State licensure requirements. When graduation from a program with specialized accreditation is required for licensure, colleges seek the required accreditation. Specialized accreditation in the Community Colleges thus tends to be limited to the health professions, primarily with the American Medical Association, the National Association for Practical Nurse Education, and the American Dental Association, as Table 11 on page 74 shows.

The annual direct costs of specialized accreditation in California's public four-year colleges and universities is slightly less than $500,000, and this

TABLE 8 Accreditation Budget, California State University, 1981-82 Through 1984-85

Program	1981-82	1982-83	1983-84	1984-85
Accounting			$ 9,144	$ 26,060
Architecture	$ 2,565	$ 3,275	674	700
Art	9,230	8,075	17,962	6,100
Business	25,425	40,250	38,869	73,720
Chemistry				
Community Health Education	5,900	150	5,846	150
Construction Education		2,575		
Dietetics	1,800	3,600	2,980	800
Engineering/Engineering Technology	15,000	29,045	6,903	13,435
Forestry		1,700	3,190	
Health Services Education	200	200	5,019	900
Home Economics	5,380	7,200	9,795	1,800
Industrial Technology	200	200	7,230	7,720
Interior Design	800	6,350	4,681	20,450
Journalism	2,150	9,350	14,039	14,700
Landscape Architecture	2,200	2,400	673	700
Librarianship		2,720		
Medical Technology	2,250	4,375	8,162	4,595
Music	12,340	8,060	13,139	19,600
Nursing	21,690	22,675	29,902	35,305
Occupational Therapy	2,065	200	192	3,870
Physical Therapy	2,880	150	3,673	900
Public Health	10,550	6,000	13,606	13,250
Radiation Technology	1,815	450	337	350
Rehabilitation Counseling	1,000	6,190	8,018	1,000
Social Work	22,880	23,440	24,369	33,550
Speech Pathology and Audiology	11,920	10,400	11,037	10,170
Teacher Education (NCATE)	8,863	22,837	16,681	17,856
Theatre Arts				5,006
Total Specialized Accreditation	$169,103	$211,867	$256,121	$312,687
University (WASC)	$ 72,866	$ 78,160	$149,428	$144,570
TOTAL, All Accreditation	$241,969	$290,027	$405,549	$457,257

Source: Office of the Chancellor, The California State University.

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TABLE 9 Annual Fees for Accreditation, University of California, 1983-84

Agency	Campus and Fees	Total Systemwide
Accreditation Board for Engineering and Technology, Inc.	Berkeley, $150; Davis, $150; Irvine, $100; Santa Barbara, $125	$ 525
American Assembly of Collegiate Schools of Business	Berkeley, $1,850; Los Angeles, $1,210	3,060
Association of American Law Schools/American Bar Association	Berkeley, $4,000; Davis, $3,210; Los Angeles, $4,195	11,405
American Medical Association		
Assistant to Primary Care Physicians	Davis, $450; Los Angeles, $500	950
Medical Technician	Davis, $250; Los Angeles, $300	550
Medical Record Administration	Los Angeles, $350	350
Radiation Therapy Technology	Los Angeles, $400	400
Cytology	San Francisco, $300	300
Physician Programs	Davis, $15,660; Irvine, $17,000; Los Angeles, $15,660 San Francisco, $15,660	63,980
Association of American Dental Schools/American Dental Association	Los Angeles, $500	500
National League for Nursing, Inc.	Los Angeles, $1,375; San Francisco, $1,375	2,750
American Council on Pharmaceutical Education	San Francisco, $3,500	3,500
American Veterinary Medical Association	Davis, $2,000	2,000
Accrediting Commission on Education for Health Services Administration	Berkeley, $500	500
American Dietetic Association		
Graduate	Berkeley, $500	500
Undergraduate	Berkeley, $150	150
Council on Education for Public Health	Berkeley, $3,000	3,000
Accrediting Council on Education in Journalism and Mass Communications	Berkeley, $300	300
Society of American Foresters	Berkeley, $801	801
American Planning Association	Berkeley, $410	410
American Society of Landscape Architects	Berkeley, $865; Davis, $865	1,730
National Architectural Accrediting Board, Inc.	Berkeley, $2,355; Los Angeles, $1,260	3,615
American Library Association	Los Angeles, $253	253
American Psychological Association	Berkeley, $575; Los Angeles, $525	1,100
Council on Social Work Education	Berkeley, $3,000; Los Angeles, $2,380	5,380
American Speech-Language-Hearing Association	Santa Barbara, $200	200
Total, Specialized Accreditation	Berkeley, $18,456; Davis, $22,585; Irvine, $17,100; Los Angeles, $28,908; San Francisco, $30,135; Santa Barbara, $325	$108,209
WASC	Berkeley, $3,650; Davis, $3,650; Irvine, $3,650; Los Angeles, $3,650; Riverside, $2,200; San Diego, $3,740 San Francisco, $2,500; Santa Barbara, $3,500; Santa Cruz, $3,100	$ 29,640
Total, All Accreditation	Berkeley, $22,106; Davis, $26,235; Irvine, $20,750; Los Angeles, $32,558; Riverside, $2,200; San Diego, $3,740; San Francisco, $32,635; Santa Barbara, $3,825; Santa Cruz, $3,100	$137,849

Source: Office of the President, University of California.

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TABLE 10 *Most Recent Costs and Frequency of Accreditation Visits, University of California*

Agency	Campus and Fees	Approximate Average Annual Costs Systemwide
Accreditation Board for Engineering and Technology, Inc.	Berkeley, $9,250, 3-6 yrs.; Davis, $8,325, 6 yrs.; Irvine, $6,000, 5 yrs.; San Diego, $6,050; Santa Barbara, $3,150, 6 yrs.	$ 6,555
American Institute of Chemical Engineering	Berkeley, $925, 6 yrs.	154
American Assembly of Collegiate Schools of Business	Berkeley, $2,000, 10 yrs.; Los Angeles, $5,000, 10 yrs.	700
Association of American Law Schools/ American Bar Association	Berkeley, $2,500, 5 yrs.; Davis, $4,044, 7 yrs.; Los Angeles, $5,727, 7 yrs.	2,045
American Medical Association		
Assistant to Primary Care Physician	Davis, $250, 3-5 yrs.; Los Angeles, $800, 3 yrs.	320
Medical Technician	Davis, $300, 5 yrs.; Los Angeles, $500, 5 yrs.	160
Radiation Therapy Technology	Los Angeles, $750, 3 yrs.	250
Accrediting Commission on Graduate Medical Education	San Diego, $900-$1,400, 3 yrs.	383
Association of American Dental Schools/ American Dental Association	Los Angeles, $8,437, 10 yrs.; San Francisco, $9,300, 7 yrs.	2,217
National League for Nursing, Inc.	Los Angeles, $1,500, 8 yrs.; San Francisco, $2,416, 8 yrs.	490
American Council on Pharmaceutical Education	San Francisco, $900, 6 yrs.	150
American Physical Therapy Association	San Francisco, $300, 5 yrs.	60
American Veterinary Medical Association	Davis, $1,783, 7 yrs.	255
Accrediting Commission on Education for Health Services Administration	Berkeley, $3,000, 5 yrs.	600
American Dietetic Association		
Graduate	Berkeley, $3,000, 5 yrs.	600
Undergraduate	Berkeley, $500, 5 yrs.	100
Council on Education for Public Health	Berkeley, $5,000-$6,000, 7 yrs.	786
American Optometric Association	Berkeley, $100, 5-7 yrs.	17
Accrediting Council on Education in Journalism	Berkeley, $2,700, 5 yrs.	540
American Society of Landscape Architects	Berkeley, $3,000, 5 yrs.; Davis, $1,783, 5 yrs.	957
National Architectural Accrediting Board, Inc.	Berkeley, $3,600, 5 yrs.: Los Angeles, $7,000, 5 yrs.	2,120
American Library Association	Berkeley, $5,400, 5 yrs.	1,080
American Psychological Association	Berkeley, $1,500, 5 yrs.; Los Angeles, $1,500, 5 yrs.	600
Council on Social Work Education	Berkeley, $4,800, 7 yrs.; Los Angeles, $5,100, 7 yrs.	1.414
American Speech-Language-Hearing Association	Santa Barbara, $1,000, 5 yrs.	300
Total, Specialized Accreditation		$22,753
WASC		
Full Accreditation (10 years)	Berkeley, $11,500; Davis, $17,600; Irvine, $9,200; Los Angeles, $34,568; Riverside, $3,300; San Diego, $9,750; Santa Barbara, $13,700	9,962
5th Year Review	Riverside, $1,662; San Diego, $6,000; San Francisco, $1,050	1,742
Total, All Accreditation		$34,457

Source: Office of the President, University of California.

figure has been increasing annually. While no detailed assessment has been made as to whether this expenditure is a worthwhile investment of public funds, Commission staff discussions with faculty and administrators indicate a strong consensus is that specialized accreditation is a positive factor in promoting a quality curriculum and faculty.

However, this strong endorsement of specialized accreditation was accompanied by some important reservations about the operations of some of the specialized agencies. These reservations included the following:

- The accrediting standards of a few professional associations impose unreasonably specific requirements on the curriculum, and thereby take decisions about curriculum content out-of-the-hands of the postsecondary institution.

- The accrediting standards of several professional associations impose unreasonable requirements for facilities and staff of small institutions, and this thereby results in the reallocation of resources within these institutions in response to the demands of accrediting associations.

  While larger institutions have the resources to provide these facilities, smaller institutions are considerably more limited. To provide the space needed for one accredited program, space is taken from another program. While this effort enhances the program which is accredited, those programs which are not accredited are weakened as they lose resources. As a consequence, limited institutional resources are being allocated in response to pressures from the accrediting associations.

- Specialized accreditation team members sometimes impose arbitrary requirements over and above the standards of the association itself. Members of visiting teams typically include representatives of large universities tions, and consequently they sometimes use inappropriate standards in their judgments about the small institutions.

- Considerable duplication occurs in the various planning and review efforts required by the specialized accrediting associations, systemwide offices, and various State agencies such as the Commission on Teacher Credentialing. Improved coordination is needed so that, for example, self studies prepared for the National Council for Accreditation of Teacher Education also satisfy the information requirements of the Commission on Teacher Credentialing.

In response both to such problems associated with specialized accreditation as well as the increasing expenditures made by public institutions for membership in these specialized accrediting agencies, the Commission recommends:

> RECOMMENDATION 13. The systemwide offices of the three public segments should review their policies regarding the role of accreditation, with special attention to those specialized accrediting associations with standards and criteria for membership that are so specific and intrusive as to limit campus authority over curriculum

TABLE 11 Specialized Accreditation of California Community Colleges and Programs, 1982

Agency	Number Accredited
American Board of Funeral Service Education	1
Accreditation Board for Engineering and Technology, Inc.	1
American Dental Association	
Dental Assisting	29
Dental Hygiene	9
Dental Laboratory Technology	6*
American Dietetic Association	4
American Medical Association	
Assistant to Primary Care Physician	3
Medical Assistant	14
Medical Record Administration	1
Medical Record Technology	4
Nuclear Medicine Technology	1
Paramedic/EMT	1
Physical Therapy	1
Radiation Therapy Technology	1
Radiologic Technology	19*
Respiratory Therapy	14
American Veterinary Medical Association	
Animal Care Technician	6*
National Association for Practical Nurse Education and Service, Inc.	31
National League for Nursing, Inc. (Associate Degree Programs)	13
TOTAL	159

*Plus one candidate for accreditation.

Source: California Postsecondary Education Commission, 1983b, pp. 191-212.

and resource allocation. Campuses should be encouraged to take the lead within specialized accrediting associations to modify those standards and practices which are particularly intrusive into campus authority. If these efforts are unsuccessful, campuses should consider terminating their membership in these associations until such standards are modified, and students and the public should be informed about the reasons for this voluntary termination.

RECOMMENDATION 14. The systemwide offices and the campuses of the three public segments should give special attention to the need for campuswide coordination of accrediting activities to facilitate cooperation, communication, and common planning for phased or joint evaluations by institutional and specialized accrediting associations in harmony with the institutions' own planning and evaluation cycles.

APPENDIX A

Standards for Accreditation
Accrediting Commission for Senior Colleges and Universities
Western Association of Schools and Colleges

(Note: These standards are excerpted from pp. 14-55 of the Commission's Handbook of Accreditation, March 1982 Edition. Not included here are the specific subsections of each part of the standards, which spell out in greater detail the obligations of institutions under the standards.)

STANDARD ONE: INSTITUTIONAL INTEGRITY

Standard 1.A. Ethical Principles and Practices. The institution demonstrates honesty and integrity in its relations with the institution's constituencies, including students and the public.

Standard 1.B. Commitment to Academic Freedom. In its policies and practices, the institution demonstrates its commitment to academic freedom.

Standard 1.C. Truth in Institutional Publications and Representations. Through catalogs, bulletins, handbooks, and the like, students and the public are provided with clear, accurate, and helpful information about programs, course offerings, and alternatives available to assist students in attaining their educational personal goals.

Standard 1.D. Relationship with the Commission. In its relationships with the Commission the institution demonstrates honesty and integrity, complies with Commission standards, policies, guidelines, and is responsive to Commission requests.

STANDARD TWO: PURPOSES

Standard 2.A. Clearly Stated Purposes. The institution is guided by clearly stated purposes, which are appropriate for higher education and consistent with Commission standards.

Standard 2.B. Distinctive Purposes. The statement of purposes defines the distinctive character and nature of the institution.

STANDARD THREE: GOVERNANCE AND ADMINISTRATION

Standard 3.A. The Governing Board. The governing board selects a chief executive officer, approves the purposes of the institution, and concerns itself with the provision of adequate funds. It establishes broad institutional policies. The board protects the institution from external pressures antithetical to academic freedom and institutional autonomy and integrity. The Board is ultimately responsible for the quality of the institution through an organized system of institutional planning and evaluation. It discriminates among roles and responsibilities of various persons or bodies, and provides stability and continuity to the institution.

Standard 3.B. Organization of Administration. Administration of the institution is organized to serve its avowed purposes effectively.

Standard 3.C. Role of Faculty. The role of faculty in institutional governance is both substantive and clearly defined.

Standard 3.D. Role of Students. The role of students in institutional governance is clearly stated and publicized.

STANDARD FOUR: EDUCATIONAL PROGRAMS

Standard 4.A. General Requirements. The attainment of quality in educational programs is central to accreditation. Institutional policies and procedures designed to assure and maintain high quality in all aspects of the institution, including its delivery of services off-campus or in nontraditional modes, are of utmost importance in accreditation and are a direct and unavoidable responsibility of every accredited institution.

If innovative or nontraditional programs exist, evaluation devices and quality controls provide reasonable assurance of outcomes equivalent superior to those of more traditional programs.

Standard 4.B. Academic Planning. Academic planning is directed toward institutional purposes, is systematic, involves representatives of all appropriate segments of the institution, and provides the rationale for projected use of human, financial, and physical resources.

Standard 4.C. Undergraduate Programs. Undergraduate degree programs, while adhering to the principles in Standard 4.A., share a commonality of components--general education, a major field, and elective opportunity--with an emphasis on education for humane, ethical, and competent participation in society.

Standard 4.D. Graduate and Professional Degrees. Graduate and professional programs, whether offered on or off-campus, whether parts of a university or free standing, offer coherently designed programs of study which are guided by appropriate and well-defined educational objectives.

Standard 4.E. Admissions and Retention. Admission and retention policies and procedures are clear and well-publicized, are related to educational purposes, and are designed to select and retain students who are likely to benefit from the educational program of the institution. These policies and procedures apply equally to students in regular and special degree programs.

Standard 4.F. Student Learning, Academic Credit, and Academic Records. Evaluation of student learning or achievement and awarding of credit are based upon clearly stated and distinguishable criteria. Academic records are accurate, secure, comprehensive, and comprehensible.

Standard 4.G. Research. Research activities of faculty and graduate students are consistent with and supportive of institutional purposes and educational programs.

Standard 4.H. Special Programs and Courses for Credit. All off-campus and other special programs providing academic credit, whether leading to a degree or for non-degree purposes, are integral parts of the institution. Their functions, goals, and objectives must be consonant with those of the institution. The institution maintains direct quality and fiscal control of all aspects of all programs and provides adequate resources to maintain this quality. The institution follows the Commission's requirements for institutional reporting.

Standard 4.I. Travel-Study Courses. Travel-study courses meet the same academic standards and requirements as on-campus courses of the institution. Academic credit is not awarded for travel per se.

Standard 4.J. Non-Credit Courses. Non-credit courses of continuing and extended education are in harmony with the educational purposes of the institution and are characterized by carefully conceived and well-organized planning and instruction, regardless of location.

Standard 4.K. Public Service. Public service, when offered, is consistent with the educational purposes of the institution.

STANDARD FIVE: FACULTY AND STAFF

Standard 5.A. Faculty Selection. Members of the faculty are qualified by training and experience to serve at the levels that the institution's purposes require.

Standard 5.B. Faculty Functions and Responsibilities. Faculty are adequate in number and diversified in discipline so as to provide effective instruction and advisement, while participating in academic planning and policy-making, curricular development, institutional governance, and scholarly or creative activity. Faculty are also committed to pure or applied research and may, in addition, provide institutional and public service.

Standard 5.C. Personnel Policies for Faculty and Staff. Personnel policies and practices which pertain to faculty and staff are clear, equitable, and published.

STANDARD SIX: LIBRARY, COMPUTER, AND OTHER LEARNING RESOURCES

Standard 6.A. Quality and Holdings. Library holdings, computers, and other learning resources are sufficient in quality, depth, diversity, and currentness to support all the institution's academic offerings at appropriate levels.

Standard 6.B. Acquisition Procedures. The selection and evaluation of library and learning resource materials are cooperative endeavors requiring strong involvement by the teaching faculty and less formal means of suggestion and recommendation by students.

Standard 6.C. Availability and Use. Books and other forms of learning materials are readily available and used by the institution's academic community, both on and off-campus.

Standard 6.D. Professional Staff. A professional staff with pertinent expertise is available to assist users of library and other learning resources.

Standard 6.E. Computing Services. Computing services are provided to the academic community in sufficient quantity and quality to support the institution's academic offerings at appropriate levels.

STANDARD SEVEN: STUDENT SERVICES AND STUDENT ACTIVITIES

Standard 7.A. Co-Curricular Educational Growth. The institution encourages out-of-class educational growth of students, consistent with educational goals.

Standard 7.B. Services to Students. Student services are available to support the objectives of out-of-class as well as in-class educational programs.

Standard 7.C. Staffing. A professional staff with pertinent expertise administers student services.

STANDARD EIGHT: PHYSICAL RESOURCES

Standard 8.A. Instruction and Support Facilities. Physical resources, particularly instructional facilities, both on and off-campus, are designed, maintained, and managed so that the institution can exercise its function and achieve its purposes.

Standard 8.B. Equipment. Equipment as appropriate to support administration, instruction, and research is available.

Standard 8.C. Physical Resource Planning. Comprehensive planning for development and use of physical resources is based on academic planning.

STANDARD NINE: FINANCIAL RESOURCES

Standard 9.A. Sufficiency of Financial Resources. Financial resources are sufficient to achieve and enhance the educational objectives to which the institution is committed. Financial resources support institutional purposes and priorities, the quality of academic and student life programs, and the general stability of the institution.

Standard 9.B. Financial Planning. Financial budgeting and planning are realistic and are based upon academic planning.

Standard 9.C. Financial Management. The financial management and organization, as well as the system of reporting, provide a basis for sound financial decision-making.

APPENDIX B

Standards for Accreditation
Accrediting Commission for Community and Junior Colleges
Western Association of Schools and Colleges

(Note: These standards are excerpted from pp. 8-38 of the Commission's Handbook of Accreditation and Policy Manual, 1981 Edition. Not included here are lists of components that spell out in greater detail the obligations of institutions under the standards.)

STANDARD ONE: GOALS AND OBJECTIVES

Standard 1.A. The institution is guided by clearly stated general goals and specific objectives which are consistent with the historical and legal mission of the public community college, or in the case of the independent institutions, are appropriate to the usual functions of postsecondary education.

Standard 1.B. The statement of goals and objectives defines the degree of comprehensiveness of the institution and its distinctive nature.

Standard 1.C. The goals and objectives are re-examined periodically with participation by all segments of the institution.

STANDARD TWO: EDUCATIONAL PROGRAMS

Standard 2.A. The educational program is clearly related to the objectives of the institution. This relationship between objectives and program is demonstrated in the policies of admission, content of curricula, requirements for graduation, and institutional methods and procedures.

Standard 2.B. Educational evaluation and planning is systematic, involves representatives of all appropriate segments of the institution, and provides the basis for planning the use of human, financial, and physical resources.

Standard 2.C. The principle institutional focus is a commitment to learning, including its evaluation and continuous improvement.

Standard 2.D. Through catalogs, bulletins, handbooks, and other publications, students and the public are provided with clear, accurate, and helpful information about programs, course offerings, and alternatives available to assist them in attaining their personal educational goals and meeting institutional requirements.

Standard 2.E. Evaluation of student learning or achievement and awarding of credit are based upon clearly stated and distinguishable criteria.

Standard 2.F. Off-campus educational programs and courses are integral parts of the institution. Their goals and objectives must be consonant with those of the institution. The institution maintains quality control of these programs and provides appropriate resources to maintain quality. Non-campus based institutions will demonstrate satisfactory quality control systems.

Standard 2.G. An accredited institution entering into any contractual relationship for credit programs or courses with persons or non-accredited organizations, ensures that educational and fiscal responsibility and control remain with and are exercised by the accredited institution.

Standard 2.H. Non-credit courses and programs, whether offered on or off-campus, are integral to the educational mission of the institution and are characterized by an equivalent quality of planning, instruction, and evaluation to that in credit programs.

STANDARD THREE: INSTITUTIONAL STAFF

Standard 3.A. The staff is qualified by training and experience to achieve and promote the educational objectives of the institution.

Standard 3.B. The faculty is committed to achieving and sustaining high levels of instruction, and may provide special campus and public services in the community served by the institution.

Standard 3.C. The staff is sufficient in number and diversity of preparation to provide effective instruction and support services, while participating in educational planning and policy-making, curriculum development, and institutional governance.

Standard 3.D. Institutional policy regarding the safeguarding of academic freedom and responsibility is clearly stated and readily available.

Standard 3.E. Personnel policies and procedures affecting staff are clear, equitable and available for information and review.

STANDARD FOUR: STUDENT SERVICES

Standard 4.A. Student services are provided to enhance educational opportunities and to meet special needs of students.

Standard 4.B. Administrators, counselors, and support staff have the qualifications to provide effective services.

STANDARD FIVE: COMMUNITY SERVICES

Standard 5.A. Institutional policies and procedures encourage use of college facilities by the public.

Standard 5.B. Community service courses are integral parts of the college educational program, intended to serve people who are not reached by the credit courses.

Standard 5.C. A varied program of cultural activities is provided to the community, both by college and community based groups.

Standard 5.D. Special programs and services are designed to reach senior, ethnic, youth and other kindred-interest groups within the community.

Standard 5.E. Budget, staffing, and placement in the organizational structure demonstrate recognition of community services as an institutional objective.

Standard 5.F. Community liaison is developed and maintained through community surveys, public information materials, and other appropriate methods.

STANDARD SIX: LEARNING RESOURCES

Standard 6.A. All learning resources (print and non-print library materials, media equipment, facilities and staff) are sufficient in quantity, depth, diversity, and currentness to support all of the institution's educational offerings at appropriate levels.

Standard 6.B. There is an organized procedure for the selection and evaluation of learning resource materials.

Standard 6.C. Learning resources are readily available and used by staff and students both on and off-campus.

Standard 6.D. A professional staff with pertinent expertise is available to assist users of learning resources.

STANDARD SEVEN: PHYSICAL RESOURCES

Standard 7.A. Physical resources, particularly instructional facilities, both on and off-campus, are designed, maintained, and managed so that the institution can fulfill its goals and objectives.

Standard 7.B. Equipment necessary for the educational program and services is furnished and maintained.

Standard 7.C. Comprehensive planning for development and use of physical resources is based on educational planning.

STANDARD EIGHT: FINANCIAL RESOURCES

Standard 8.A. Financial resources are sufficient to support institutional objectives, maintain the quality of its program and services, and serve the number of students enrolled.

Standard 8.B. Financial planning is based on educational planning.

Standard 8.C. Business management of the institution exhibits sound budgeting and control, and proper records, reporting, and auditing.

STANDARD NINE: GOVERNANCE AND ADMINISTRATION

Standard 9.A. The board establishes broad policies to guide the institution, selects an effective chief executive officer and administration, approves educational programs and services, secures adequate financial resources and ensures fiscal integrity, and exercises responsibility for the quality of the institution through an organized system of institutional planning and evaluation. The board is entrusted with the institution's assets, with upholding its educational mission and program, with ensuring compliance with laws and regulations, and with providing stability and continuity to the institution.

Standard 9.B. A primary function of administration is to provide leadership that makes possible an effective teaching and learning environment for achievement of the institution's stated purposes.

Standard 9.C. The role of faculty in institutional governance is clearly defined.

Standard 9.D. The role of support staff (nonfaculty status) and of students in institutional governance is clearly defined.

STANDARD TEN: DISTRICT OR SYSTEM RELATIONSHIPS

Standard 10.A. The system has an official set of objectives, policies which define system-college relationships, and an organizational plan which establishes lines of authority and allocates responsibilities.

Standard 10.B. The system has communication methods, both internal and external, which provide for the flow of information in a timely and efficient manner.

Standard 10.C. The system has an organized process for coordinating program development and evaluation, facilities planning, and budget development and administration.

Standard 10.D. The system develops and publishes appropriate policies and agreements governing employment, compensation and benefits, working conditions, staff evaluation, and staff transfer and reassignment.

APPENDIX C

Institutions of Higher Education Operating in California Accredited by the Western Association of Schools and Colleges, February 1984

CALIFORNIA INSTITUTIONS

Allan Hancock College
American Academy of Dramatic Arts West
American River College
Antelope Valley College
Armstrong College
Art Center College of Design
Azusa Pacific University
Bakersfield College
Barstow College
Bethany Bible College
Biola University
Brooks College
Brooks Institute
Butte College
Cabrillo College
California Baptist College
California College of Arts and Crafts
California College of Mortuary Science
California College of Podiatric Medicine
California Family Study Center
California Institute of the Arts
California Institute of Integral Studies
California Institute of Technology
California Lutheran College
California Maritime Academy
California Polytechnic State University, San Luis Obispo
California School of Professional Psychology
California School of Professional Psychology, Berkeley
California School of Professional Psychology, Fresno
California School of Professional Psychology, Los Angeles
California School of Professional Psychology, San Diego
California State University System
California State College, Bakersfield
California State College, San Bernardino
California State College, Stanislaus
California State Polytechnic University, Pomona
California State University, Chico
California State University, Dominguez Hills
California State University, Fresno
California State University, Fullerton
California State University, Hayward
California State University, Long Beach
California State University, Los Angeles

California State University, Northridge
California State University, Sacramento
Canada College
Cerritos College
Cerro Coso Community College
Chabot College
Chaffey Community College
Chapman College
Christ College Irvine
Christian Heritage College
Church Divinity School of the Pacific
Citrus College
City College of San Francisco
Claremont University Center
Claremont Graduate School
Claremont McKenna College
Coastline Community College
Cogswell College
College of Alameda
College of the Canyons
College of the Center for Early Education
College of the Desert
College of Marin
College of Notre Dame
College of Oceaneering
College of the Redwoods
College of San Mateo
College of the Sequoias
College of the Siskiyous
Columbia College
Compton Community College
Consortium of the California State University
Contra Costa College
Cosumnes River College
Crafton Hills College
Cuesta College
Cuyamaca College
Cypress College
De Anza College
Deep Springs College
Defense Language Institute
Diablo Valley College
Dominican College of San Rafael
Dominican School of Philosophy and Theology
Don Bosco Technical Institute
D-Q University (Lower Division)
East Los Angeles College
El Camino College
Evergreen Valley College
The Fashion Institute of Design and Merchandising
The Fashion Institute of Design and Merchandising - Branch Campuses
Feather River College
Fielding Institute
Foothill College

Franciscan School of Theology
Fresno City College
Fresno Pacific College
Fuller Theological Seminary
Fullerton College
Gavilan College
Glendale Community College
Golden Gate Baptist Theological Seminary
Golden Gate University
Golden West College
Graduate Theological Union
Grossmont College
Hartnell Community College
Harvey Mudd College
Heald Colleges
Central California Commercial College
Heald Business College, Hayward
Heald Business College, Sacramento
Heald Business College, San Francisco
Heald Business College, San Jose
Heald Business College, Walnut Creek
Heald Institute of Technology, San Francisco
Heald Institute of Technology, Santa Clara
Heald's Kelsey-Jenney College
Hebrew Union College - Jewish Institute of Religion
Holy Family College
Holy Names College
Humboldt State University
Humphreys College
Immaculate Heart College
Imperial Valley College
Indian Valley Colleges
Jesuit School of Theology
John F. Kennedy University
Kings River Community College
Lake Tahoe Community College
Laney College
Lassen College
Loma Linda University
Long Beach City College
Los Angeles Baptist College
Los Angeles City College
Los Angeles Harbor College
Los Angeles Metropolitan College
Los Angeles Mission College
Los Angeles Pierce College
Los Angeles Southwest College
Los Angeles Trade-Technical College
Los Angeles Valley College
Los Medanos College
Loyola Marymount University
Marymount Palos Verdes College
Mendocino College
Menlo College

Mennonite Brethren Biblical Seminary
Merced College
Merritt College
Mills College
Miracosta College
Mission College
Modesto Junior College
Monterey Institute of International Studies
Monterey Peninsula College
Moorpark College
Mount St. Mary's College
Mt. San Antonio College
Mt. San Jacinto College
Napa Valley College
National University
Naval Construction Training Center
Naval Postgraduate School
New College of California
Northrop University
Occidental College
Ohlone College
Orange Coast College
Otis Art Institute of Parsons School of Design
Oxnard College
Pacific Christian College
Pacific College
Pacific Oaks College
Pacific School of Religion
Pacific Union College
Palomar College
Palo Verde College
Pasadena City College
Patten College
Pepperdine University
Pitzer College
Point Loma Nazarene College
Pomona College
Porterville College
Queen of the Holy Rosary College
Rand Graduate Institute
Reedley College
Rio Hondo College
Riverside City College
Sacramento City College
Saddleback College
St. John's College
St. John's Seminary
St. Joseph's College Seminary
St. Mary's College of California
St. Patrick's Seminary
San Bernardino Valley College
San Diego City College
San Diego Mesa College
San Diego Miramar

San Diego State University
San Francisco Art Institute
San Francisco College of Mortuary Science
San Francisco Community College District
City College of San Francisco
San Francisco Community College Centers
San Francisco Conservatory of Music
San Francisco State University
San Francisco Theological Seminary
San Joaquin Delta College
San Jose City College
San Jose State University
Santa Ana College
Santa Barbara City College
Santa Monica College
Santa Rosa Junior College
Saybrook Institute
School of Theology at Claremont
Scripps College
Shasta College
Sierra Community College
Simpson College
Skyline College
Solano Community College
Sonoma State University
Southern California College
Southern California College of Optometry
Southwestern College
Stanford University
Taft College
Thomas Aquinas College
United States International University
University of California
University of California, Berkeley
University of California, Davis
University of California, Irvine
University of California, Los Angeles
University of California, Riverside
University of California, San Diego
University of California, San Francisco
University of California, Santa Barbara
University of California, Santa Cruz
University of Judaism
University of La Verne
University of the Pacific
University of Redlands
University of San Diego
University of San Francisco
University of Santa Clara
University of Southern California
University of West Los Angeles
Ventura College
Victor Valley College
Vista College

West Coast Christian College
West Coast University
Western State University College of Law of Orange County
Western State University College of Law of San Diego
West Hills Community College
West Los Angeles College
Westmont College
West Valley College
Whittier College
Woodbury University
World College West
Wright Institute
Yuba College

REGIONALLY ACCREDITED INSTITUTIONS FROM OTHER REGIONS OPERATING WASC ACCREDITED PROGRAMS WITHIN CALIFORNIA

Brigham Young University
College of St. Thomas
Southern Illinois University at Carbondale
Southern Illinois University at Edwardsville
Webster University

APPENDIX D

Process and Standards for Approval
California State Department of Education

(Note: These standards are excerpted from the Department's "Guidelines for Approval of Specific Degrees Under Education Code Section 94310(b)," September 1982.)

The California Education Code includes the following information concerning the approval process:

> The institution has been approved by the superintendent to award or issue specific degrees. The superintendent shall not approve an institution to issue degrees until it is determined, based upon information submitted to him or her, that the institution has the facilities, financial resources, administrative capabilities, faculty, and other necessary educational expertise and resources to afford students and require of students the completion of a program of education which will prepare them for the attainment of a professional, technological, or educational objective, including, but not limited to, a degree; and the curriculum is consistent in quality with curricula offered by established institutions that issue the appropriate degree upon the satisfactory completion thereof. This shall include the determination that the course for which the the degree is granted achieves its professed or claimed objective for higher education. The criteria developed hereunder shall be such as will effectuate the purposes of this chapter, but will not unreasonably hinder legitimate educational innovation.

The yardstick utilized by the State Department of Education in the evaluation of institutions is the practices and standards of "accredited institutions of higher education, public and private, which offer similar programs." Consistent with the stipulations made in the Education Code, there are five areas for which criteria have been developed and placed in the California Administrative Code, Title 5, Section 18839.

The five areas of study -- financial stability, facilities, faculty, course of study, and degree requirements -- provide the framework for the self-study document which each applicant must prepare.

Process for First-Time Degree Approval

- Institution prepares a self-study draft, utilizing the guidelines provided by the State Department of Education.

- The self-study and related materials are submitted to the State Department of Education, following a preliminary review by Department staff to determine that the materials are complete.

- A committee of educators from accredited and approved institutions visit the institution to review its educational program. Working with the assistance of a consultant from the State Department of Education, the committee prepares a report about the institution.

- The Council for Private Postsecondary Educational Institutions reviews the committee report and makes a recommendation about the institution.

- The Superintendent of Public Instruction makes a decision to grant full approval, conditional approval, or disapprove the application.

Criterion for Approval

(a) Financial Stability. The institution shall maintain assets sufficient to ensure capability of fulfilling the specific program to enrolled students. In all instances, such assets shall be at least as great as those specified in California Education Code Section 94310(c)(2) for authorized degree-granting institutions.

Selected standards included in this criteria include the provisions that the funds on which the institution operates are not limited to current tuition or accounts receivable, that there are financial records that show financial stability, and that the governing or advisory board makes recommendations to the school regarding budgetary and other fiscal concerns.

(b) Faculty. Faculty resources shall include personnel who possess degrees from United States Department of Education recognized accredited institutions in the proposed degree major field(s) and in sufficient number to provide the proposed educational services.

Selected standards included in this criteria include the provisions that there are sufficient numbers of faculty members who have been trained in accredited (USDE-recognized) institutions to staff the major degree fields, that the criteria for faculty selection are clearly stated and related to the institutional purposes and are utilized in hiring, and that the faculty members are available to students for sufficient lengths of time to provide instruction and/or advising.

(c) Course of Study. The educational services shall clearly relate to the proposed degree(s) objectives, be comparable in scope and sequence to minimum standards of comparable degree programs in accredited institutions recognized by the U.S. Office of Education, and shall, in the judgment of the visiting committee, ensure quality educational services to the degree candidate. This requirement shall not be construed to prevent the approval of innovative educational services.

Selected standards included in this criteria include the provisions that there are acceptable criteria for determining whether credit is awarded for past college work or other experiences; admissions policies are clearly stated and, when applied, have resulted in admission and nonadmission of students; the stated sequence of activities through which a student passes in pursuit of a degree is stated clearly and followed faithfully; and instructional activities which take place at the institution or away from the institution are equal to each other and follow standards which set the minimums for hour of instruction and student contact, work output to secure credit, and teacher-to-student ratio.

(d) Facilities. Facilities must relate to the defined degree objectives. The stated educational services define the needed facilities, and the visiting committee must express a judgment that the facilities available are sufficient to ensure the student quality educational services.

Selected standards included in this criteria include the provisions that the library holdings are adequate to support the curricular offerings; instructional facilities are appropriate for the methods of instruction; and the facilities provide adequate space, equipment, and supplies for the staff.

(e) Degree Requirements. The specified institutional requirements for the degree(s) shall be evaluated against established standards for similar degrees in accredited institutions. The student is to be assured that the degree so approved shall not deviate substantially from all other such degrees as a mark of learning, although the processes in a particular institution may deviate markedly from those occurring in other institutional settings.

Selected standards included in this criteria include the provisions that in terms of courses offered and course content, the requirements for all degrees are comparable to those of other institutions; the institution, if nontraditional, assumes the responsibility for maintaining quality equal to or better than traditional institutions; there is definite evidence that degrees are awarded on the basis of demonstrated competency; and the institution has provided quality education to sufficient numbers of students to establish a clear success pattern. Baccalaureate degrees are expected to include a minimum of 124 semester units (including 40 general education units and 40 upper-division units), master's degrees are expected to include a minimum of 30 semester units (including 21 semester units in residence), and doctoral degrees shall include a minimum of 50 semester units of exclusively graduate courses, excluding dissertation, thesis, and practicum credit.

Institutions Offering Degrees Approved by the California Superintendent of Public Instruction, January 1984

Academy of Art, San Francisco
    Master of Fine Arts
    Bachelor of Fine Arts

- Academy of Arts and Humanities, Seaside
  - Bachelor of Arts in Fine Arts
  - Bachelor of Arts in Dance
  - Bachelor of Arts in Applied Music
  - Bachelor of Music Science
  - Bachelor of Arts in Language
  - Bachelor of Arts in Drama
  - Bachelor of Arts in Linguistics
  - Master of Fine Arts in Applied Music
  - Master of Fine Arts in Fine Arts
  - Master of Arts in Drama
  - Master of Arts in Applied Linguistics

- American Armenian International College, La Verne
  - Bachelor of Arts in Armenian Studies
  - Bachelor of Science in Computer Science/Computer Engineering
  - Bachelor of Arts in Diversified Major/Armenian Emphasis
  - Bachelor of Science in Electronic Engineering

- American Christian Theological Seminary, Anaheim
  - Master of Arts in Biblical Studies
  - Master of Divinity

- American Conservatory Theatre, San Francisco
  - Master of Fine Arts in Acting

- Anaheim Christian College, Anaheim
  - Bachelor of Arts in Ministry

- Bay City College of Dental Medical Assistants, San Francisco
  - Associate of Science in Cardio Respiratory Technician
  - Associate of Science in Ceramics and Porcelain Dental Lab Tech.
  - Associate of Science in Crown and Bridge Dental Lab Technician
  - Associate of Science in Dental Assisting
  - Associate of Science in Full Mouth Dentures Dental Lab Tech.
  - Associate of Science in Medical Assisting
  - Associate of Science in Medical Laboratory Assisting
  - Associate of Science in Veterinary Medical Assisting

- California American University, Escondido
  - Doctor of Philosophy in Applied Behavioral Science
  - Master of Science in Education
  - Master of Science in Management

- California Christian College, Fresno
  - Associate of Arts in Bible
  - Bachelor of Science in Bible

- California Christian Institute, Anaheim
  - Master of Arts in Marriage, Family and Child Therapy

- California Coast University, Santa Ana
  - Bachelor of Science in Management
  - Bachelor of Science in Business Administration
  - Doctor of Education Degree
  - Doctor of Philosophy in Management
  - Doctor of Philosophy in Business Administration
  - Master of Business Administration
  - Doctor of Philosophy in Psychology
  - Master of Science in Psychology
  - Bachelor of Science in Psychology
  - Doctor of Philosophy in Engineering
  - Master of Science in Engineering
  - Bachelor of Science in Engieering

- California Graduate Institute, West Los Angeles
  - Doctor of Philosphy in Psychology
  - Master of Arts in Psychology

- California Graduate School of Theology, Glendale
  - Master of Arts in Church Administration
  - Doctor of Ministry

- California Graduate School of Marital and Family Therapy, San Rafael
  - Doctor of Philosophy in Clinical Psychology
  - Doctor of Marital, Family, and Child Therapy
  - Doctor of Philosophy in Marital and Family Therapy

- California Institute of Transpersonal Psychology, Menlo Park
  - Master of Arts in Transpersonal Psychology
  - Doctor of Philosophy in Transpersonal Psychology

- California Missionary Baptist Institute and Seminary, Bellflower
  - Associate in Theology
  - Bachelor of Theology
  - Doctor of Theology
  - Master of Theology

- California Pacific University, San Diego
  - Master of Arts in Management and Human Behavior
  - Master of Arts in Management and Human Behavior (Correspondence)

- Center for Psychological Studies, Berkeley
  - Doctor of Philosophy in Clinical Psychology
  - Doctor of Philosophy in Developmental Psychology

- Center Graduate College, Saratoga
  - Master of Arts in Education

- Charles R. Drew Postgraduate Medical School, Los Angeles
  - Doctor of Medicine

Christian Heritage College, El Cajon
    Bachelor of Science in Biological Science
    Bachelor of Arts in History/Social Science
    Bachelor of Arts in English
    Bachelor of Arts in Ministerial Training
    Bachelor of Science in Physical Science
    Bachelor of Science in Home Economics
    Bachelor of Science in Education
    Bachelor of Science in Counseling Psychology
    Bachelor of Science in Business Administration

Cleveland Chiropractic College, Los Angeles
    Doctor of Chiropractic
    Bachelor of Science in Human Biology

Columbia College, Los Angeles
    Associate of Arts in Motion Pictures
    Bachelor of Arts in Motion Pictures
    Bachelor of Arts in Dramatic Arts
    Associate of Arts in Dramatic Arts
    Bachelor of Arts in Television and Radio Engineering
    Associate of Arts in Television and Radio Engineering
    Bachelor of Arts in Radio
    Associate of Arts in Radio
    Associate of Arts in Television Broadcasting
    Bachelor of Arts in Television Broadcasting
    Bachelor of Arts in Journalism
    Associate of Arts in Journalism

Columbia Pacific University, San Rafael
    Bachelor of Arts in Administration and Management
    Master of Arts in Administration and Management

Condie Junior College of Business and Technology, Campbell
    Associate of Business Management

Glendale University College of Law, Glendale
    Bachelor of Law
    Masters of Laws
    Bachelor of Science In Law
    Juris Doctor

Graduate Center for Child Development and Psychotherapy, Los Angeles
    Doctor of Philsophy in Clinical Child Psychology

Heald Institute of Technology, San Francisco
    Bachelor of Science in Engineering
    Associate of Arts in Electronic Engineering Technology
    Bachelor of Science in Electronic Engineering

Human Relations Center, Santa Barbara
    Master of Arts in Counseling Psychology

Humphreys College, Stockton
    Bachelor of Science in Accounting
    Bachelor of Science in Computer Science
    Bachelor of Science in Management
    Bachelor of Science in Paralegal Studies
    Juris Doctor

Institute for Advanced Study of Human Sexuality, San Francisco
    Doctor of Education in Human Sexuality
    Doctor of Human Sexuality
    Master of Human Sexuality
    Doctor of Philosophy in Human Sexuality

Institute for Clinical Social Work, Sacramento
    Doctor of Philosophy in Clinical Social Work

Institute for Creation Research, El Cajon
    Master of Science in Astro Geophysics
    Master of Science in Biology
    Master of Science in Geology
    Master of Science in Science Education

International College, Los Angeles
    Bachelor of Fine Arts in Creative Arts
    Master of Fine Arts in Creative Arts
    Doctor of Philosophy in Psychology
    Bachelor of Arts
    Bachelor of Science in Health Sciences
    Master of Arts in Communication Arts
    Master of Arts in Society

Koh-E-Nor University, Santa Monica
    Master of Arts in Applied Human Relationship

Laurence University, Santa Barbara
    Doctor of Philosophy in Education
    Doctor of Education
    Master of Arts in Education

Linda Vista Baptist Bible College and Seminary, El Cajon
    Master of Tehology
    Master of Divinity
    Master of Religious Education
    Bachelor of Theology
    Master of Science in Library Science
    Bachelor of Religious Education
    Bachelor of Arts

Magna Carta University School of Law, South San Francisco
    Juris Doctor
    Bachelor of Science in Law

National Technical School, Los Angeles
- Associate of Science in Computer Technology
- Associate of Science in Electronics Technology

National University, San Diego
- Master of Science
- Master of Arts
- Doctor of Science
- Doctor of Arts
- Bachelor of Science
- Bachelor of Arts
- Master of Public Administration
- Doctor of Public Administration
- Bachelor of Public Administration
- Bachelor of Laws
- Bachelor of Science in Laws
- Doctor of Jurisprudence
- Bachelor of Business Administration
- Master of Business Administration
- Doctor of Business Administration
- Master of Technology
- Doctor of Technology
- Bachelor of Technology
- Associate of Technology
- Associate of Applied Sciences
- Master of Technical Education
- Doctor of Technical Education
- Bachelor of Technical Education

New College for Advanced Christian Studies, Berkeley
- Master of Arts
- Master of Christian Studies
- Master of Theological Studies

New School of Architecture, Chula Vista
- Bachelor of Architecture

Newport University, Newport Beach
- Doctor of Religion
- Master of Arts in Religion

Oakland College of Dental Medical Assistants, Oakland
- Associate of Science in Medical Laboratory Assisting
- Associate Science in Full Mouth Dentures Dental Lab Technician
- Associate of Science in Ceramics and Porcelain Dental Lab Tech.
- Associate of Science in Crown and Bridge Dental Lab Technician
- Associate of Science in Dental Assisting
- Associate of Science in Medical Assisting
- Associate of Science in Veterinary Medical Assisting

Pacific Coast Baptist Bible College, San Dimas
- Bachelor of Arts in Christian Education
- Bachelor of Arts in Theology
- Bachelor of Arts in Music
- Bachelor of Arts in Business

- Pacific Graduate School of Psychology, Menlo Park
  - Master of Science in Clinical Psychology
  - Doctor of Philosophy in Clinical Psychology

- Pasadena College of Chiropractic, Pasadena
  - Bachelor of Science in Chiropractic
  - Doctor of Chiropractic

- Professional School of Psychological Studies, San Diego
  - Doctor of Philosophy in Counseling Psychology
  - Bachelor of Arts in Psychology
  - Master of Arts in Counseling Psychology

- Professional School of Psychological Studies, San Francisco
  - Bachelor of Arts in Psychology
  - Doctor of Philosophy in Counseling Psychology
  - Master of Arts in Counseling Psychology

- Phychological Studies Institute, Palo Alto
  - Doctor of Philosophy in Clinical Psychologist
  - Master of Arts in Counseling Psychology
  - Master of Arts in Clinical Psychologist
  - Doctor of Philosophy in Counseling Psychology

- Rancho Arroyo Vocational Technical Institute, Sacramento
  - Associate of Science in Dental Technology

- Rosebridge Institute, Pleasant Hill
  - Master of Arts in Psychology
  - Doctor of Philosophy in Psychology

- Ryokan College, Los Angeles
  - Bachelor of Arts in Humanistic Studies
  - Master of Arts in Humanistic Studies
  - Doctor of Philosophy in Humanistic Studies

- Samuel Merritt Hospital School of Nursing, Oakland
  - Bachelor of Science in Nursing
  - Associate of Science in Nursing

- Saybrook Institute, San Francisco
  - Master of Arts in Psychology
  - Doctor of Philosophy in Human Sciences
  - Doctor of Philosophy in Psychology

- Simon Greenleaf School of Law, Orange
  - Bachelor of Laws
  - Bachelor of the Science of Law
  - Juris Doctor
  - Master of Arts
    - Christian Apologetics
    - Theology and Law
    - Human Rights

Southern California Psychoanalytic Institute, Beverly Hills
    Doctor of Philosophy in Psychoanalysis

Sysorex Institute, Cupertino
    Associate in Data Processing

University Associates Graduate School of Human Resource Development San Diego
    Master of Arts in Human Resource Management
    Master of Arts in Human Resource Development

University for Humanistic Studies, San Diego
    Doctor of Philosophy in Humanistic Psychology
    Master of Arts in Humanistic Psychology

University Without Walls, Santa Monica
    Bachelor of Arts in Psychology
    Master of Arts in Psychology
    Doctor of Philosophy in Psychology
    Bachelor of Arts in Societal Dimension
    Master of Arts in Societal Dimension
    Bachelor of Arts in Communication/Arts
    Master of Arts in Communication/Arts
    Bachelor of Science in Health Science
    Bachelor of Science in Health Services
    Bachelor of Arts in Environment

Walden University, San Diego
    Doctor of Education in Social and Education Change
    Doctor of Philosophy in Social and Education Change

Western Graduate School of Psychology, Palo Alto
    Master of Arts in Behavioral Science
    Doctor of Philosophy in Clinical Psychology

Western Institute for Social Research, Berkeley
    Doctor of Philosophy in Higher Education and Social Change
    Master of Arts in Education
    Master of Science in Social Philosophy
    Master of Arts in Psychology
    Bachelor of Arts in Psychology
    Master of Arts in Human Services and Community Development
    Bachelor of Arts in Human Services and Community Development
    Master of Science in Social Sciences
    Bachelor of Arts in Social Sciences
    Master of Arts in Humanities/Arts
    Bachelor of Arts in Humanities/Arts

Western States College of Engineering, Inglewood
    Bachelor of Science in Electronic Engineering
    Associate of Science in Electronics Engineering Technician

William Carey International University, Pasadena
    Master of Arts in Applied Linguistics
    (Teaching English to Speakers of Other Languages)

World University of America, Ojai
    Associate of Arts in Philosophy
    Bachelor of Arts in Philosophy
    Bachelor of Arts in Psychology
    Associate of Arts in Psychology

Wright Instiute Los Angeles, Los Angeles
    Doctor of Philosophy in Social-Clinical Psychology

Yeshiva University of Los Angeles
    Bachelor of Judaic Studies
    Bachelor of Arts in Judaic Studies

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APPENDIX E

Changes in the Constitution of the Western Association of Schools and Colleges, Approved by the Senior Commission, June 20-22, 1984

ARTICLE III. Organization

Section 1. The Board of Directors shall consist of nine persons, three to be selected for staggered three-year terms from and by each of the three Accrediting Commissions hereinafter named and described. One of each Commissions's appointees shall be its Chair or Vice Chair. The Board shall elect its Chair~~man~~ from among its members for a one-year term. The Chair~~man~~ may be re-elected for one additional one-year term, but may not serve more than two such terms in succession. The chair~~man~~ of the Board shall be the President of the Association. The Secretary-Treasurer of the Association shall be selected by the Board.

Section 2. The Board of Directors shall meet annually at such time as may be determined by the Board, and may hold other meetings at the call of the Chair~~man~~ or on the request of any three members of the Board of Directors.

Section 3. There shall be three Accrediting Commissions, as follows:

a. Accrediting Commission for Senior Colleges and Universities

> This Commission shall consist of members appointed ~~selected~~ for overlapping three-year terms~~, at least six of whom are appointed~~ by the Western College Association, one of whom shall be named Chair~~man~~. One member shall be appointed from its membership by the Accrediting Commission for Community and Junior Colleges. One member shall be appointed from its membership by the Accrediting Commission for Schools. The Pacific Basin, the Northwest region, and the general public shall also be represented. ~~For an unspecified term,~~ The President of the Western College Association shall be ~~a member, ex officio~~ an ex officio member.
>
> Nominations for members of the Commission will be solicited from member institutions by a Nominating Committee, appointed by the Western College Association Executive Committee and composed of: the President Elect of the Western College Association, the Chair of the Commission, the Western College Association Executive Secretary-Treasurer, and faculty, administrative, and public representatives. The Executive Committee will ensure that there is a balance on the Nominating Committee among public and independent institutions.
>
> Members of the Commission will be allowed to complete their terms upon retirement from their institutions. Non-public Commissioners who lose their institutional base for any other reason or who move out of the WASC region or the Northwest region, in the case of members appointed from that region, will give up their positions on the Commission.

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